Environmental MANUAL

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It is under a controlled distribution system.

This Environmental Manual sets forth the environmental system policies and defines compliance with the ISO 14001 requirements.
PURPOSE

Covert Manufacturing’s environmental management system complies with the ISO 14001 Environmental Management System Requirements.

The purpose of this manual is to:
• Describe Covert Manufacturing’s environmental management system
• Define responsibilities, authorities, and the interrelationships of the key operating management segments
• Provide the direction for each of the functional activities
• Provide controls that ensure the requirements will be met.

The manual is numbered in sections that relate directly to the applicable elements of the ISO 14000 standard.

This manual is also used for external purposes such as third party audits and to provide customers with information concerning the environmental system in place at Covert Manufacturing.

COMPANY OVERVIEW

Covert Manufacturing produces a variety of metal parts and components for military and agricultural motive equipment applications. On Covert’s South East Street campus rests seven (7) buildings that support a variety of functions and operations. Covert also operates a facility with two separate buildings on East Parsons Street in Galion. The main campus houses manufacturing operations conducted under two (2) separate divisions: Machine Divisions 1 and the Mold and Tooling Solutions Division. The Parsons Road location operates under Machine Division 2.

The Mold and Tooling Solutions Division manufactures molds, machines and full assembly lines for the automotive and other industries. To accomplish this, the division employs a variety of manufacturing processes. For mold manufacturing, a large steel or aluminum slab is received and subsequently machined at one of several large CNC machines in the department. In addition to steel and aluminum, molds can be produced from wood or plastic. Plastic slabs are also received through Bay 3 prior to machining; however, the bases for wood molds are constructed in the wood shop.

Supporting operations for mold manufacturing include the mold assembly area, mold measurement and the mold test area. Mold assembly is where the molds are assembled after machining, while the measurement area uses a sophisticated measurement machine to measure the dimensions of the mold to ensure it meets customers’ strict criteria. Finally, the mold test area utilizes one of two compression presses to test the mold prior to shipment to the customer.

Other functions within the Mold and Tooling Solutions Division include the fabrication area where sections of steel are welded together to form some segments of the assembly line. Not all sections are welded, however all sections are painted in the
paint booth. The sections of painted steel structure are assembled in the assembly area prior to shipment to the customer.

All products manufactured at our plant are included in the scope of the environmental Management system (EMS).

Covert Manufacturing’s Chemist has been appointed as the Management Representative for both the ISO 14000 based environmental system. These systems are combined, where practical. The responsibilities of the EMS Management Rep include insuring that processes are established, implemented, and maintained according to the ISO 14000 standards and that company objectives are met.

The EMS Management Rep is also responsible for reporting to top management on continual improvement of our EMS.

1. **SCOPE**

The scope of our Environmental Management system is:

“Manufacturer of precision machined components and assemblies including tooling.”

As part of management review, changes to the scope of Covert Manufacturing’s business that could affect the applicability of the above TS 16949 and ISO 14001 requirements, will be considered and modifications made to Covert Manufacturing’s quality and environmental management systems accordingly.

2. **REFERENCES**

TS 16949 Quality Management System Requirements  
ISO 14000 Environmental Management System Requirements

3. **TERMS AND DEFINITIONS**

Currently, there are no terms or definitions that need to be defined in this document. Definitions will be added as needed.

4. **ENVIRONMENTAL MANAGEMENT SYSTEM**

4.1 **GENERAL REQUIREMENTS**

A company-wide environmental management system has been established, documented, implemented and maintained by the management of Covert Manufacturing as a means to ensure conformance to specified legal and other requirements and continued compliance to ISO 14000. Covert Manufacturing documents its environmental system utilizing the following hierarchy:
**Quality and Environmental Manuals**: First-level documents that provide a general overview of the Quality and Environmental Systems and define the quality and environmental policy. The Environmental Manual is numbered corresponding to each of the elements of ISO 14000 Environmental System Requirement.

**Quality and Environmental Procedures**: Second-level documents that provide more detailed explanation of the Quality and Environmental Systems elements and detail the structure of the management systems.

**Work Instructions**: Third-level documents that provide step-by-step instructions on how activities are to be carried out.

**Forms and Records**: Fourth-level documents or data that contain the information, charts, checklists, or other form of records as evidence to demonstrate conformance to specified requirements and the effective operation of the Quality and Environmental Systems.

In the course of developing this documented environmental management system, Covert has:

- Determined the necessary processes and their application (see attachment)
- Determined the sequence and interaction of these processes (see attachment)
- Defined methods for evaluating the effectiveness of these processes through environmental policy, objectives, management review and analysis of data.
- Ensured availability of resources (see attachment)
- Monitored, measured where applicable, and analyzed these processes
- Established corrective and preventive action and continual improvement processes

The Document Map and Process Sequence & Interaction attachments, of this manual, identify the processes used to implement Covert’s environmental management system processes, their sequence and interaction.

### 4.2 Environmental Policy

Top management has defined Covert Manufacturing environmental policy in a procedure and has ensured that it

- a) is appropriate to the nature, scale and environmental impacts of its activities, products and services;
- b) includes a commitment to continual improvement and prevention of pollution;
c) includes a commitment to comply with relevant environmental legislation and regulations, and with other requirements to which it subscribes;
d) provides the framework for setting and reviewing environmental objectives and targets;
e) is documented, implemented, maintained and communicated to all employees;
f) is available to the public.

4.3 Planning

4.3.1 Environmental Aspects

Covert Manufacturing has established and maintains a procedure (ESP-01) that describes how Covert identifies the environmental aspects of its activities and products that it can control and over which it can be expected to have an influence, in order to determine those which have or can have significant impacts on the environment. Covert Manufacturing has ensured that the aspects related to these significant impacts are considered in setting its environmental objectives. This information is kept up-to-date.

Covert has identified aspects that could possibly impact the environment, impact employee safety, use excessive natural resources and create unnecessary waste. We have taken measures to control, reduce or eliminate our impact to the environment. These controls include but are not limited to the following:

- Annually inspect fire extinguishers and sprinkler system
- Proper inspections and documentation for paint booths
- Storm water testing
- Monthly and annual crane inspections
- Recycle machine scrap and packaging
- Limit waste in the form of disposable gloves
- Reduction of power usage
- Preventative maintenance of forklifts
- Crane and sling inspections
- Various employee training programs
- Proper control of hazardous waste

4.3.2 Legal and other requirements

Covert Manufacturing has established and maintains a procedure (ESP-01) that describes how Covert identifies and determines access to
legal and other requirements to which Covert Manufacturing subscribes, that are applicable to the environmental aspects of its activities and products.

### 4.3.3 Objectives and targets

Covert Manufacturing has established and maintains documented environmental objectives and targets, at each relevant function and level within the organization.

When establishing and reviewing these objectives, Covert Manufacturing considers the legal and other requirements, its significant environmental aspects, its technological options and its financial, operational and business requirements, and the views of interested parties.

These objectives and targets are consistent with Covert Manufacturing environmental policy, including its commitment to prevention of pollution.

### 4.3.4 Environmental Management Program

Covert Manufacturing has established and maintains a procedure (ESP-01) that describes how Covert achieves its objectives and targets.

This program includes

a) designation of responsibility for achieving objectives and targets at each relevant function and level of the organization
b) the means and time-frame by which they are to be achieved

If a project relates to new developments and new or modified activities or products, the program is amended where relevant to ensure that environmental management applies to such projects.

### 4.4 Implementation and operation

#### 4.4.1 Structure and responsibility

The roles, responsibility and authorities have been defined, documented and communicated through documented procedures and job descriptions in order to facilitate effective environmental management.

Covert Manufacturing’s management has provided resources essential to the implementation and control of the environmental management system. Resources include human resources and specialized skills, technology and financial resources.

Covert Manufacturing’s top management has appointed the Environmental Manager as the representative who, irrespective of
other responsibilities, has the defined roles, responsibilities and authority for

a) ensuring the environmental management system requirements are established, implemented and maintained in accordance with this International Standard

b) reporting on the performance of the environmental management system to top management for review and as a basis for improvement of the environmental management system.

4.4.2 Training, awareness and competence

Covert Manufacturing has identified training needs and requires that all personnel whose work may create a significant impact upon the environment, have received appropriate training.

Covert Manufacturing has conducted training and established, maintained and controlled job descriptions and work instructions to make its employees or members at each relevant function and level aware of

a) the importance of conformance with the environmental policy and procedures and with the requirements of this environmental management system;

b) the significant environmental impacts, actual or potential, of their work activities and the environmental benefits of improved personal performance;

c) their roles and responsibilities in achieving conformance with the environmental policy and procedures and with the requirements of the environmental management system, including emergency preparedness and response requirements;

d) the potential consequences of departure from specified operating procedures.

Personnel performing the tasks that can cause significant environmental impacts are competent on the basis of appropriate education, training and/or experience.

4.4.3 Communication

With regard to its environmental aspects and environmental management system, Covert Manufacturing has established and maintains a procedure (ESP-01) for

a) internal communication between the various levels and functions within the organization;

b) receiving, documenting and responding to relevant communication from external interested parties.

Covert Manufacturing has considered its processes for external communication on significant environmental aspects and recorded its decision.
4.4.4 Environmental Management System documentation

Covert Manufacturing has established and maintains this Environmental Manual that

a) describes the core elements and procedures of the environmental management system and their interactions;

b) provides direction to related documentation.

4.4.5 Document Control

Covert Manufacturing has established and maintains a procedure (QP 4.2.3) for controlling all documents required by this International Standard to ensure that

a) they can be located;

b) they are periodically reviewed, revised as necessary and approved for adequacy by authorized personnel;

c) the current versions of relevant documents are available at all locations where operations essential to the effective functioning of the environmental management system are performed;

d) obsolete documents are promptly removed from all points of issue and points of use, or otherwise assured against unintended use;

e) any obsolete documents retained for legal and/or knowledge preservation purposes are suitably identified.

Documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner and retained for a specified period. Procedures and responsibilities have been established and are maintained concerning the creation and modification of the various types of documents.

4.4.6 Operational Control

Covert Manufacturing has identified the operations and activities that are associated with the identified significant environmental aspects in line with its policy, objectives and targets. Covert Manufacturing plans these activities, including maintenance, in order to ensure that they are carried out under specified conditions by

a) establishing and maintaining work instructions to cover situations where their absence could lead to deviations from the environmental policy and the objectives and targets;

b) stipulating operating criteria in the work instructions;

c) establishing and maintaining work instructions related to the identifiable significant environmental aspects of goods and services used by Covert Manufacturing and communicating relevant information and requirements to suppliers and contractors.

4.4.7 Emergency preparedness and response
Covert Manufacturing has established and maintains a procedure (ESP-02) for all employees that identify potential for and actions required to respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them.

Covert Manufacturing reviews and revises, where necessary, its emergency preparedness and response procedure, in particular, after the occurrence of accidents or emergency situations.

Covert Manufacturing periodically tests this procedure where practicable.

4.5 Checking and Corrective Action

4.5.1 Monitoring and measurement

Covert Manufacturing has established and maintains documented procedures and work instructions to monitor and measure, on a regular basis, the key characteristics of its operation and activities that can have a significant impact on the environment. This includes recording information to track performance, relevant operational controls and conformance with Covert Manufacturing environmental objectives and targets.

Monitoring equipment is calibrated and maintained and records of this process are retained according to Covert Manufacturing procedure QP 7.6.

Covert Manufacturing has established and maintains a documented procedure (ESP-01) for periodically evaluating compliance with relevant environmental legislation and regulations.

4.5.2 Non-conformance and Corrective and Preventive Action

Covert Manufacturing has established and maintains a procedure (QP 8.3) for defining responsibility and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused and for initiating and completing corrective (QP 8.5.2) and preventive action (QP 8.5.3).

Any corrective or preventive actions taken to eliminate the causes of actual or potential non-conformances are appropriate to the magnitude of problems and commensurate with the environmental impact encountered.

Covert Manufacturing implements and records any changes in the documented procedures resulting from corrective and preventive action.

4.5.3 Records
Covert Manufacturing has established and maintains a procedure (QP 4.2.4) for the identification, maintenance and disposition of environmental records. These records include training records and the results of internal audits and reviews.

Environmental records are legible, identifiable and traceable to the activity or product involved. Environmental records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss. Their retention times are established and recorded.

Records are maintained, as appropriate to the system and to the organization, to demonstrate conformance to the requirements to this International Standard.

4.5.4 Environmental Management System Audit

Covert Manufacturing has established and maintains a procedure (QP 8.2.2) for periodic environmental management system audits to be carried out, in order to

a) determine whether or not the environmental management system

1) conforms to planned arrangements for environmental management including the requirements of this International Standard; and

2) has been properly implemented and maintained; and

b) provide information on the results of audits to management.

Covert Manufacturing’s audit program, including the audit schedule, is based on the environmental importance of the activity concerned and the results of previous audits. In order to be comprehensive, the audit procedure covers the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results.

4.6 Management Review

Covert Manufacturing’s top management, not less than annually, reviews the environmental management system to ensure its continuing suitability, adequacy and effectiveness. The management review process ensures that the necessary information is collected to allow management to carry out this evaluation. This review is documented.

The management review addresses the possible need for changes to policy, objectives and other elements of the environmental management system, in light of the environmental management system audit results, changing circumstances and the commitment to continuous improvement.
5. ATTACHMENTS

5.1 ORGANIZATION CHART

5.2 ENVIRONMENTAL SYSTEM MAP

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Quality Manager
FIGURE 1

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