

## Arandell Corporation 2008 Functional Equivalency Documentation

**Adoption of an environmental policy that includes a commitment to compliance with environmental requirements, pollution prevention and continual improvement in environmental performance.**

The core of Arandell Corporation's IEMS is our environmental policy. The environmental policy states in broad terms the principal environmental commitments of Arandell Corporation. It is signed by our President and has been communicated to all associates. The environmental policy is posted on bulletin boards throughout the plant and is available on request to the public, customers and authorities. The IEMS coordinator is responsible for ensuring that only the most recent version of the environmental policy is posted and available.

Arandell has developed an environmental policy that is the building block of our EMS, and that we take very seriously. This policy can be found on our Web site, [www.arandell.com](http://www.arandell.com), and in our EMS documentation. Arandell's EMS Policy is as follows:

- Provide leadership that encourages and supports actions that favor our natural environment.
- Promote the use of recycled and environmentally-friendly materials throughout our operation.
- Offer our production facilities as a test site for new products that limit negative impact on the quality of air, water, and land.
- Continue to invest capital in the latest and most effective pollution control equipment.
- Maintain our commitment to surpass Federal and State laws regulating water and air quality.
- Collaborate with suppliers and customers to implement programs which limit the environmental impact of our product throughout its lifecycle from manufacturing to disposal.
- Develop yearly onsite visits with our partners' facilities to gauge their level of environmental responsibility.
- Continually improve our products and our environmental programs and accomplishments to reduce our footprint on the environment.

**An analysis of the environmental aspects and impacts of an entity's activities.**

Arandell reviews the plant and office environmental aspects annually. These aspects are derived by our Green Tier team and monitored within the EMS. The team reviews these aspects and makes recommendations about which aspects will become projects throughout the year.



**Plans and procedures to achieve compliance with environmental requirements and to maintain that compliance.**

Arandell maintains a strict form of compliance documentation. As a primary aspect, our compliance with air regulations is recorded and reviewed monthly with assistance from our environmental consultant. Other compliance aspects (e.g., hazardous waste, waste water, storm water) are reviewed as appropriate to assure continual compliance with federal, state, and local requirements.

**Identification of all environmental requirements applicable to the entity.**

Current environmental requirements and compliance with those requirements are reviewed by our Green Tier team and monitored within the EMS. Any possible new applicable requirements are assessed by our Green Tier team upon discovery. New applicable requirements are then addressed by determining what aspects and impacts need to be met with some environmental improvement programs. Our approach incorporates implementation systems (e.g., metrics, administrative and engineering controls, operating procedures, etc.) aiming to assure environmental compliance as well as illustrate any continual environmental improvements whenever the potential exists. Environmental requirements include the following areas:

- Air Permitting - Compliance with all conditions in our Title V Operation Permit No. 268012360-P10.
- Hazardous Waste – Compliance with all applicable requirements for large quantity generators per WDNR Administrative Code NR 660.
- Waste Water – All applicable requirements listed in the Milwaukee Metropolitan Sewerage District's (MMSD) "District Regulations and Enforcement Procedures".
- Storm Water – compliance with WDNR Storm Water Administrative code NR 216. Arandell is currently covered under the "No Exposure" condition per NR 216.21(3).

**A process for setting environmental objectives and developing appropriate action plans to meet the objectives.**

Arandell uses the following steps from our EMS:

- The EMS Management Team is responsible for considering the environmental aspects and impacts of operations at Arandell Corporation. The team is charged with developing a list of aspects from which significant ones will be selected as objectives and targets for continuous improvement, as described by the company environmental policy.
- A schedule is created by the EMS Team to meet and complete actions as described in paragraph one. It will follow the established schedule for internal and external auditing related to the Arandell EMS compliance.
- The Company EMS team will use EMS audit results, process diagrams, gap analysis, cost data and non-conformance information, as well as other tools and



information to develop a comprehensive list of environmental aspects and impacts.

- The EMS Team will use an agreed-upon criteria such as a numeric scale of 4 to 1 (4=most significant, 1=least significant) or other criteria to determine the level of impact from aspects.
  - Air emissions from printing or parts cleaning processes or other sources;
  - Hazardous Waste generated from solvents, waste ink or other waste materials;
  - Solid Waste to landfill including all wastes that go to landfill;
  - Solid Waste to recycling including all materials that are required by law to be recycled;
  - Other wastes such as rags that are laundered;
  - Chemical use impacting safety or health;
  - Waste water management and sludge;
  - Regulatory compliance issues;
  - Energy costs;
  - Operational procedures having impact on the environment;
  - Others as identified by the EMS team, audits or non-conformances.
- Those aspects with the highest total number of points or the most impact using agreed upon criteria will become Arandell's initial and annual list of significant aspects from which objectives and targets will be established and environmental programs implemented if needed.
- This procedure will be completed once each year to update the Company's objectives and targets, as well as demonstrate continuous improvement of the EMS.
- This will be completed after auditing but before management review.
- The EMS Team Leader or designated management representatives will specifically mention the progress toward objectives and targets in the annual management review.

### **Establishment of a structure for operational control and responsibility for environmental performance.**

Arandell has specific job descriptions for all of our associates. These descriptions are thorough and cover all aspects of environmental, safety and job functions.



Operation procedures are reviewed and assessed by our Green Tier team for possible changes that may result in environmental improvements. These procedures may include administrative and/or engineering controls pertaining to our operations. Any activities or procedures developed by the team are conveyed to the appropriate associates in those affected departments to assure proper implementation.

**An associate training program to develop awareness of and competence to manage environmental issues.**

All of our associates are placed through an orientation, where they are given the required training specific to their job. This training may include, but is not limited to Personal Protective Equipment, Emergency Evacuation, spill procedures and applicable OSHA and safety training. Arandell has enlisted the help of a consultant, Safety Connections, to aid us with this training. Each associate is introduced to Arandell's EMS program in order to understand that environmental improvement is part of the philosophy at Arandell. New associates will be updated and will understand any operational procedures associated with our EMS that are associated with their job activities, and are encouraged to be active in offering ideas that may be considered by our Green Tier team for EMS improvement strategy.

**A plan for taking actions to prevent environmental problems and for taking emergency response and corrective actions when environmental problems occur.**

Arandell has in place a Spills Prevention, Controls and Countermeasures (SPCC) Plan which establishes potential sources for spills, describes the controls in place in the event of a spill, and the procedures for controlling those spills if they occur. The SPCC incorporates our Emergency Response Plan that covers natural and environmental emergencies. This plan is registered with our local fire department and County. TEHSPCC also incorporates our Hazardous Waste Management Plan which addresses contingency and procedures specific to the hazardous waste storage and handling regulations.

**A communication plan for collaboration with associates, the public and the department on the design of projects and activities to achieve continuous improvement of environmental performance.**

Internet, *Glimpses*, *Grapevine*, internal memos, local newspapers and trade publications are all tools that Arandell uses to communicate and coordinate the design of EMS projects developed by our Green Tier team. The public is addressed via Internet media, such as our Web site, newspapers and trade publications. Design Projects are communicated from the Green Tier team department leaders, which then communicate the applicable projects and procedures to each affected associate.

**Procedures for control of documents and for keeping records related to environmental performance.**

All of Arandell's documentation is kept on file. Electronic media has been established to organize and make available any documentation related to EMS. The Green Tier team will establish proper procedures for procuring and controlling the proper documentation related to any improvement projects. Department leaders will be responsible for conveying to their department associates the proper methods and frequency for recording and reporting data deemed pertinent to the project.



### **Environmental Management System audits.**

Arandell will be due for an internal audit at the end of 2009. Plans for our internal audit will involve our Green Tier team, along with our environmental consultant. The audit will address both levels of the audit process by assessing the performance of the EMS “system,” as well as the EMS “compliance” facets of the EMS.

### **A plan for continually improving environmental performance and provision for senior management review of the plan.**

Continuous process improvement is a natural outcome of Green Tier. Arandell’s EMS team meets weekly to review the status of all projects. The goal of the meetings is not only to update the team, but also to review what roadblocks exist and how to resolve them. This method has been instrumental in keeping all of our projects active. The meetings are divided into two parts. First, we review the status of all projects, followed by a roundtable of ideas and questions for any other area of improvement that may lead to a project. An example of this is the wooden pallet recovery project. Broken pallets were not an aspect on our original “aspect and impacts” outline. During a weekly meeting, however, a team member mentioned a conversation with an associate questioning Arandell’s practice of disposal. That conversation resulted in the birth of the wooden pallet recovery project.

Senior Management Review will be performed on an annual basis. Arandell’s approach currently involves Senior Management as part of the Green Tier team meetings on an ongoing basis.

