

Functional Equivalency Documentation

Wis. Stats 299.83(1) (dg) defines a functionally equivalent environmental management system (EMS) as one that includes all of the 12 elements listed in the statute, as well as any other that the department determines is essential elements of the ISO 14001 standard. The following is an explanation of how Times Printing's Environmental Management System, conforms to each of the 12 elements listed in the statute and provides examples of how these elements are being implemented at Times Printing Co.

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

The company is building an environmental attitude where everyone is involved in improving the overall environmental awareness of the company and the impact we have on the environment and the community.

The environmental policy for Times Printing Co Inc can be found on our internet site, www.timesprintingco.com, and on our intranet site for employees to access. It is also available on our EMS bulletin board in building 1 and will be up in the cafeteria and in the front lobby for the community and visitors to see.

EMS 1.1 – Environmental Policy
EMS Procedure 1.0 – Developing Environmental Policy

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

The Times' EMS team which consists of individuals from all departments, went through their department and put together all of the resources that were brought in and used in the manufacturing process. As a group, we tracked what happened to those resources from the beginning of our process to the end of our process, and then we put this information into flow charts. We then could look at a particular department or machine and follow the flow of resources and what happens to those resources and what the environmental impacts are of those resources and our manufacturing process. We then had each department decide what their priorities were with regards to these flow of resources. The results of the analysis of aspects and impacts have poured over into the setting of objectives and targets.

Analyzing the aspects and impacts showed all departments that getting a handle on normalizing the recycling efforts was a high priority.

Referenced documents:
EMS 2.4 through 2.13 – Department Flow Charts
EMS Procedure 2.0 – Developing Environmental Aspects/Impacts
EMS 2.2 – Environmental Aspects
EMS 2.3 – Significant Impacts evaluation form

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

Prior to establishing an EMS, we had a permit tracking form we used to track requirements under our applicable permits.

One thing that has come up short according to our audit is certain plans to maintain compliance in certain departments, specifically the pressroom. We have general knowledge of requirements, and there are many Sop's that we have incorporated environmental requirements into already, but we have not yet established a hard copy procedure for a number of items that were highlighted in the audit.

Referenced documents

- EMS Procedure 3.0 – Legal Requirements
- EMS 3.1 – Permit Tracking Form
- EMS 3.2 – Compliance requirement calendar checklist
- EMS 3.3 – Malfunction Plan
- EMS 7.1 – 7.3 – RTO maintenance checks

4-Identification of all environmental requirements applicable to the entity.

While establishing the EMS, we realized we get a lot of our information on compliance through our trade organization PIW and PIA/GATF. We established an annual compliance schedule where we could track when certain requirements needed to be addressed and/or reported. EMS 4.1 will be filled out by EHS department when new requirement are identified in order to efficiently notify all departments when changes occur.

Referenced documents:

- EMS Procedure 4.0 – Identification of Environmental Requirements
- EMS 4.1 – New environmental regulatory requirements

5-Process for setting environmental objectives and developing the appropriate action plans to meet the objectives

The process of working towards environmental objectives and developing action plans was a very time consuming process. Each committee member put together the resources used in their departments, analyzed the usage of the materials to follow them through the manufacturing process. We looked at all the materials used and identified what happens to those materials after the manufacturing process is done, i.e. part of end product, manufacturing by product etc... We labeled each section with their appropriate aspects or impacts on the environment. From there we have been currently looking through the flow charts that were referenced above in the aspects and impacts section and coming up with objectives and goals. Each department puts goals together based off of those flow charts and those are referenced in our Action Plans. See table below for current action plans:

Department	Environmental Impact/issue to be addressed	Specific objectives and targets	Employee responsible for change
Office	<p>Paper/scrap recycling (this was being done, but not formalized)</p> <p>Inkjet and toner recycling (this was being done by not formalized)</p>	<p>To formalize the recycling of paper and printer cartridges and toners. Educate employees on why and how.</p>	<p>Russ Shoup(CSR)/ Wendy Scholler</p>
Shipping/Receiving	<p>Recycling of all white paper through shipping/receiving department</p> <p>Forklift emissions</p> <p>Recycling of black rubber mats that come in on roll trucks.</p>	<p>To formalize the recycling efforts in the department, educate employees on why and how.</p> <p>Work on more efficient means of transportation and idling practices.</p> <p>Find a recycler for black rubber matting from roll trucks.</p>	<p>Randy Reetz</p>
Pressroom	<p>Reduction of autowash VOC's</p> <p>Recycle/reuse of auto wash (in house)</p>	<p>The pressroom has started to test other auto wash in order to find a low voc wash that works.</p> <p>To try out a system of in house recycling of our wash.</p>	<p>Eric Witt</p>
Pre-Press	<p>Paper and ink cartridge recycling</p>		<p>Jeff Johnson</p>
Plating	<p>No objectives processed yet</p>		<p>Rodney Krahn</p>
Finishing	<p>Recycling efforts all around</p>	<p>Working on universalizing throughout the</p>	<p>Wayne Goehring</p>

	<p>Inkjet use/management</p> <p>Plastic strapping recycling and shrink wrap recycling</p>	<p>bindery department managed recycling program</p> <p>Looking at the change from a methanol based inkjet to acetone based inkjet to reduce emissions</p> <p>Plastic strapping and shrink wrap recycling efforts.</p>	
Mailing	<p>Management of paper recycling</p> <p>Film Kleen usage</p>	<p>Manage paper recycling better.</p> <p>Eliminate the usage in mailing of film kleen.</p>	<p>Leanne Herman/Scott Risch</p>

Referenced documents:

- EMS 5.1 through 5.7 – EMS Action Plans
- EMS Procedure 5.0 – Setting Objectives and Action Plans

6 - Structure of operational control

Times Printing has a structure set up within our established standard operation procedures (SOP) in place to deal with work instructions and procedures. Job descriptions define position responsibilities. We are currently updating the job descriptions through human resources, and environmental responsibilities are being integrated into those descriptions. The one thing that we have yet to get together is the maintenance schedules from all departments. Some have been established for many years and incorporate compliance requirements and some have not been updated to include current procedures.

Referenced Documents:

- EMS Procedure 6.0 – Establishing work instructions
- EMS 6.1 – Ink Waste Management
- EMS 6.2 – Inkjet Waste Management
- EMS 6.3 – Blanket Wash Waste Management
- EMS 6.4 – Oil Waste Management
- EMS 6.5 – Inkjet Rags Waste Management
- EMS 6.6 – Laundered Rags Waste Management
- EMS 6.7 – Absorbent socks/pads recycling

7 - An employee training program to develop awareness of and competence to manage environmental issues

Employees are trained in the proper way to do their job the first week they are hired, which includes safety training. We realized that one of our biggest problems is a formalized training program on the plant floor with regards to procedures, which include environmental responsibilities. In the past, this has been passed down from supervisor to stitcher operators regarding finishing responsibilities and 1st and 2nd pressman to rolltenders regarding pressroom environmental responsibilities. Our ink technician also deals with a great majority of the environmental responsibilities regarding the pressroom.

Very little of this training has ever been documented, other than safety training, so this has been one of the biggest focuses for our company to work on. This is one of our biggest work in progress at this point. We have an individual working on 2nd shift that is putting together a specific training program for the pressroom, which will include environmental responsibilities; and we have an individual on 1st shift working on bindery training programs which will follow the same process. We are mirroring a program through GATF for pressroom and finishing.

Examples of things that are dealt with include disposal of waste ink, wash, oil, and the proper way to dispose of laundered rags.

Referenced documents:

- EMS procedure 7.0 – Employee Training Requirements and Recordkeeping
- EMS 7.1 – Employee Training Records
- EMS 6.1 – 6.7 – Waste Management Tasks

8-A plan for taking actions to prevent environmental problems and for taking emergency response and corrective actions when environmental problems occur

We have a committee of individuals looking at all of our emergency response procedures, fire, severe weather, and medical emergencies to integrate them into a complete emergency response program. Each set of procedures have been established for a long time now, and our biggest challenge was just organizing them into one program. The one thing we came across in addressing these procedures and updating them was the updating of our spill procedures and incorporating them with our basic emergency response procedures.

Every year we go through our fire and severe weather evacuation procedures.

Referenced documents:

- EMS Procedure 8.0 – Developing emergency response procedures and continuous updating
- EMS 8.1 - Fire Emergency procedures;
- EMS 8.2 - Severe Weather Procedures;
- EMS 8.3 - Medical Emergency procedures;
- EMS 8.4 – Spill Procedures
- EMS 8.5 – Power Outage Procedures
- EMS 7.7 – Chemical Test Information form

9-A communication plan for collaboration with employees, the public, and the department on the design of projects and activities to achieve continuous improvement in environmental performance.

Times Printing Co. has always had a good relationship with our surrounding community having been an employer in the area for over 80 years. The company has very deep roots in our area. We have not up until this point documented our communications with the community. We currently have a Times newsletter that goes into the local community newspaper called The Sounder which highlights the things that the company is doing, who works here and what they do to make our company continue to grow, and what new equipment and processes are coming into the plant. It has been a great way to communicate to the surrounding area's not only what we manufacture, but the things we do for our employees, our customers and neighbors.

Our president and owners are very active in the community, attending village meetings and being a part of our volunteer fire and rescue department. Our owners are very much an integral part of the communication aspect of anything we do here.

With regards to internal communications, the press check is also out for all employees, and we have bulletin boards posting the latest updates, as well as a "things you can use" email that goes out monthly from our general manager.

Referenced document: Times Press check

http://www.timesprintingco.com/content/files/presscheck2006/2006-Winter_TimesPressCheck.pdf

EMS Procedure 9.0 – Communication Procedures for internal and external communications
EMS 9.1 – Environmental updates form for community release

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

All though rudimentary, our control of documents is established in a file on the environmental managers desktop as well as in easily accessible binders within the environmental managers' office. We have a pretty basic way of controlling these documents; whenever something changes it is updated in the computer file and in the binders. Records can be supplied to our customers or our government contacts at anytime. Access to these files can be done by our IT department, and President. Documents that are retired are put into a retired folder to be saved.

EMS Procedure 10.0 – Control of Documents

11 – Environmental Management System Audits

Our internal auditing procedures are compiled on separate audit forms. These audit forms outline what specific area's are to be audited and what needs to be looked at. Examples are attached of the audit forms from this year.

We went through an internal audit of the program this year in the end of April. There were some things that needed to be addressed; those issues are provided in this report where applicable.

Referenced document:

Audit Forms EMS 11.1 – 11.12

EMS Procedure 11.0 – Structure of Environmental System Audits

12 – A plan for continually improving environmental performance and provision for senior management review of the plan

The plan and procedures we have put together consist of our plan for improving environmental performance. We update management through out monthly EMS team meetings. This keeps everyone apprised of what is new and what things still need to be worked on.

Management reviews will be on a continuous basis through managers meetings twice a month and through our committee meetings. We also have a weekly plant review that is conducted by a person in management from each department. This cycle goes for 6 months and then reviewed. This allows managers from other departments to see the rest of the plant and give suggestions for improvements to overall aesthetics and environmental, health and safety concerns.

Referenced document:

EMS Procedure 12.0 – Continuous Improvement on Environmental Performance

EMS 12.1 - Weekly Plant Reviews

EMS 12.2 - Monthly EMS Management Update