



ISO 14001:2004

Environmental Management System Manual

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Held by: EMS Management Representative

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1.0 SCOPE

The manufacture of superb quality coating and graphic printing services.

As the environmental vision, we shall recognize that the protection of the earth's environment is one of the most important subjects of mankind, and shall positively contribute to realization of preservation of the earth's environment and to realization of society that can support the dreams of future generations.

2.0 DISTRIBUTION

Distribution is accomplished electronically, and is managed by the Document Coordinator.

3.0 INTRODUCTION

This environmental manual provides the following:

- *A guide to the operation of the environmental management system in Hanes Erie, Inc. in Fairview, Pennsylvania.*
- *A detailed description of how the requirements of ISO 14001:2004 are addressed by means of the environmental management system at **Hanes Erie, Inc.***
- *Reference to the procedures that are involved in the operation of the system.*

This manual should be used as the starting point for understanding the operation of the system and as a basis for setting the internal and environmental audit program.

The numbering system used in the manual is explained in section 4.1.

4.0 DETAILS OF ENVIRONMENTAL MANAGEMENT

4.1 Overview

The following sections of this manual are set out to follow the numbering system applied to the elements in the international standard ISO 14001:2004.

4.2 Environmental Policy

The following environmental policy has been produced in line with the requirements of ISO 14001:2004 and is displayed within the premises in Fairview, and is available to suppliers, customers and the public upon request.

*It is the policy of **Hanes Erie, Inc.** that we are committed to formulating and supplying what we produce with due regard to quality and environmental impacts and in full compliance with relevant environmental regulation and any applicable codes of practice. We will:*

- Evaluate all products, for environmental effects and to minimize the potential for pollution.*
- Dispose of all solid or liquid wastes in accordance with the requirements defined by regulation.*
- Work with our suppliers and customers in applying full lifecycle responsibility to our products.*
- Review our environmental performance on a regular basis and develop and implement procedures to ensure continuous improvement.*
- Develop and implement Risk Control incentives to minimize the potential consequences of accident and emergency situations.*
- Monitor our energy consumption on a regular basis and implement appropriate energy reduction and efficiency improvement programs.*
- Establish objectives and targets to secure continual environmental improvements.*

This policy is designed to ensure compliance with all Corporate Environmental Objectives. Copies of this Environmental Policy and all Objectives and Targets are publicly available upon request.

Andrew Hanes

*Andrew Hanes
Vice President Operations
Hanes Erie, Inc.*

4.3 Planning

4.3.1 Environmental Aspects

The Environmental Aspects Review is reviewed at least twice a year as per the EMS Management Program. The Environmental Management Representative ensures that it is up-to-date and that aspects with significant impacts (value 3 or greater) are considered in setting environmental objectives, and identifying capital projects.

4.3.2 Environmental and Other Requirements

*Review and evaluation of legislation and other requirements as appropriate to the activities at the site in Fairview and to the destinations of the products are handled by means of the environmental Work Instruction, Quality Regulatory Review. Where legislation is directly related to an aspect of the process or other activity conducted by **Hanes Erie, Inc.**, this process or activity will be considered as being significant.*

4.3.3 Objectives, Targets and Programs

Company-specific objectives and targets are established following the review of environmental aspects. Objectives and targets must be written for environmental aspects with a significance value of 4 or 5; they may be written for aspects with lower significance. Objectives and targets are recorded within the form "Objectives and Targets Record". The record is updated at least monthly by the Quality Department and is reviewed at least quarterly by the Environmental Management Representative.

Other performance-oriented goals may be established within the framework of Care Teams. Personal performance objectives for appropriate employees within the organization also include environmental issues and concerns.

4.4 Implementation and Operation

The environmental management program elements are reviewed annually by the Quality Manager and/or other appropriate employees, and changes made as necessary. A schedule of these reviews is included in the EMS Program Management Record.

4.4.1 Roles, Resources, Responsibilities and Authority

The following roles and responsibilities have been designated for the control of the environmental management system operating under ISO 14001:2004.

Where appropriate, these responsibilities are detailed in specific operating procedures (QSP's).

Synopsis of Roles

1. *The Care Team is responsible for the routine monitoring of environmental performance. Spill incidents and other environmental issues and concerns are reviewed and discussed during meetings. The Team provides input to the Environmental Management Representative to ensure that issues and concerns are addressed. The Team consists of representatives from Operations, Facilities, and Quality. Regular meetings are held.*
2. *The Document Coordinator is responsible for the documentation of the EMS system.*
3. *The Quality Director is responsible for development and maintenance of the system and carrying out the recommendations of the Environmental Management Representative and for integrating environmental considerations with those of health & safety.*
4. *The Internal Audit Team carries out the internal and environmental audit program, and provides input from audits to the Environmental Management Representative to ensure maintenance of the program.*
5. *The Environmental Management Representative is responsible for the high level control of the EMS and its co-ordination with the other management systems operating within **Hanes Erie, Inc.** and those in the parent organization. See Section 4.6 for additional information on the responsibilities of this team.*

EMS Management Representative

- *Set the audit program in conjunction with the CIA (Coordinator of Internal Audits)*
- *Designated management appointee at Fairview*
- *Control of system documents and records*
- *Preparation of audit summary report for EMS Management Review.*

Quality Director

- *Set the environmental management program*
- *Aspect identification and preliminary evaluation*
- *Update legislation record*
- *Co-ordinate environmental training program*
- *External communication on environmental concerns*
- *Draft environmental procedures as required*
- *Suggest objectives & targets based on the aspect evaluations*
- *Provide environmental reports*
- *Provide initial environmental risk assessments*
- *Allocate responsibilities for detailed environmental risk assessments*
- *Provide support for the Care Team*
- *Monitor Environmental performance.*

Internal/Environmental Audit Team

- *Audit of the environmental management system and the quality system according to the agreed program.*

Care Team

- *Monitor ISO 14001:2004 activities (e.g., audits, aspect identification and evaluation, procedure modification, etc.)*
- *Assist to identify training requirements*
- *Review environmental incidents, issues and concerns*
- *Review, endorse and assist the implementation of action plans*
- *Recommend additional corrective actions.*

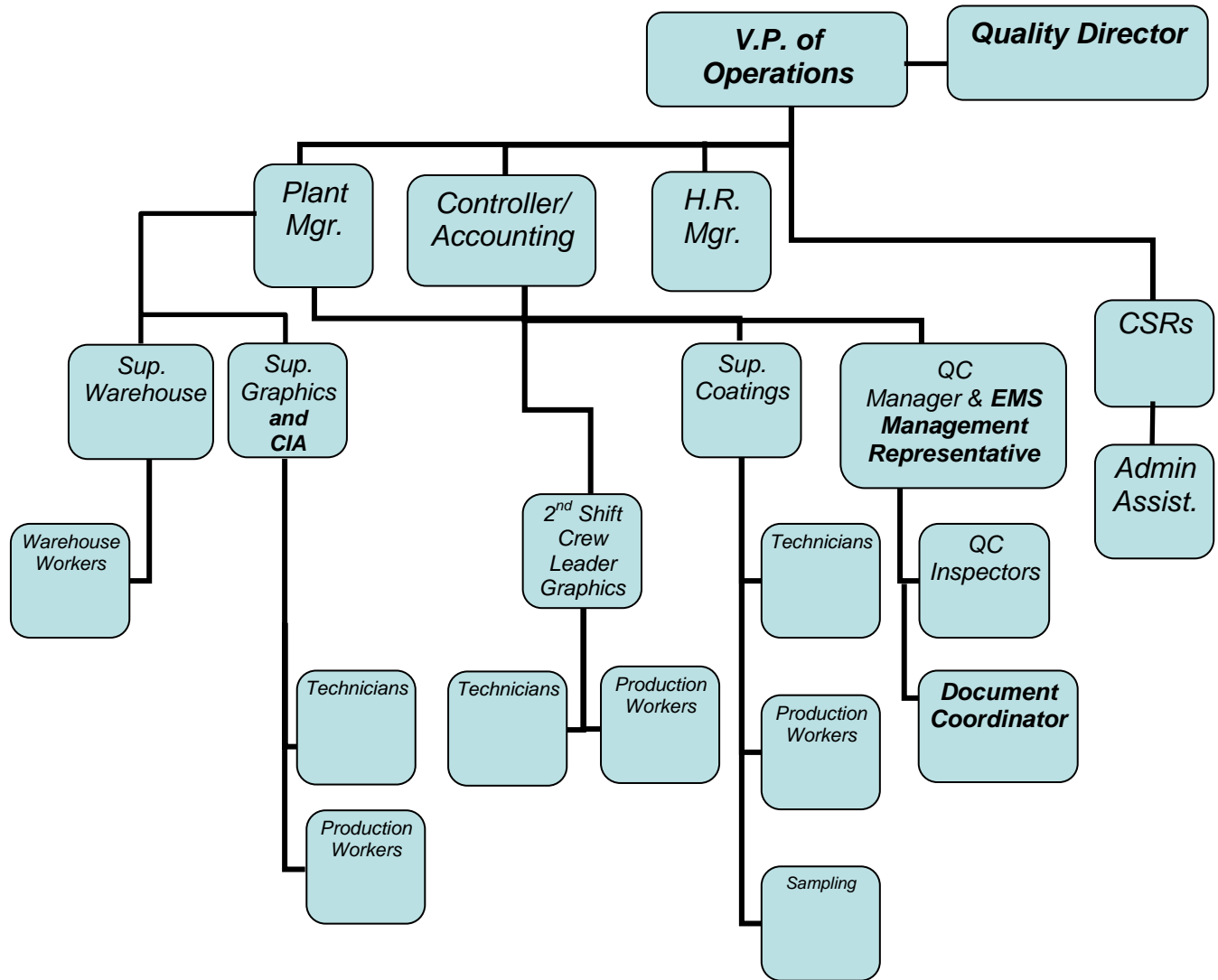
Document Coordinator

- *Responsible for the Documentation of the EMS system.*

All Employees

- *Follow written procedures (QSP's) and work instructions according to the training provided.*

Figure 1 Organizational Chart



4.4.2 Training, Awareness and Competence

Environmental information and training is provided to new hires during their orientation. Periodic information and training is also provided during routine safety meetings. On the job training ensures that employees perform their job tasks in a safe and environmentally responsible manner. The Quality Department developed and implemented an employee training matrix. The matrix is used to help establish training topics for initial orientation, as well as the monthly/quarterly safety meetings.

Training records are maintained by Human Resources. They are maintained for an employee's term of service, plus one year.

4.4.3 Communication

Hanes Erie, Inc. has several formal and informal methods of communication for the internal discussion of environmental issues and concerns. Bulletin boards and e-mail are used to inform employees. Hanes Erie, Inc. stresses its "open door" policy for employees to informally raise issues and concerns.

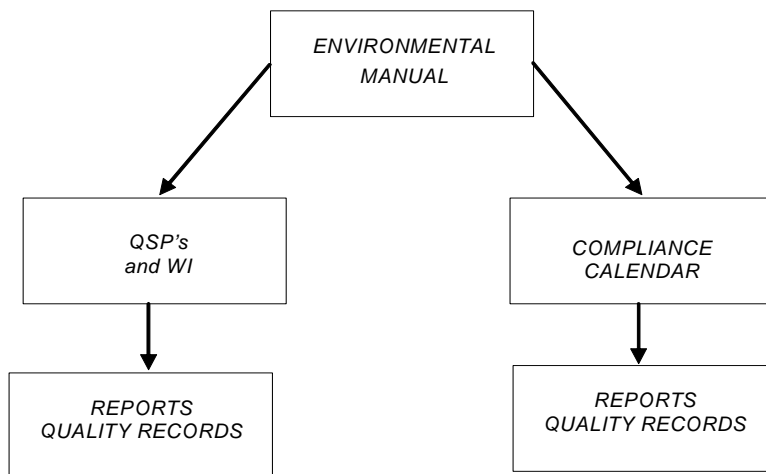
Environmental issues and concerns are addressed during the routine meetings of Management Review.

Communications from external sources are directed to the Quality Department. Documentation is maintained by the Quality Department.

Hanes Erie, Inc.'s official website is used to communicate externally.

4.4.4 System Documentation

Documentation for the control of the environmental management system is held in electronic format, paper format is for reference only. The following diagram illustrates the relationships between the different types of document.



QSP's relate directly to the requirements of ISO 14001:2004. Work Instructions (WI) provide information for carrying out operational tasks and may give rise to documentation for precise control. Quality Records are generated from both QSP's and WI.

4.4.5 Document Control

Hanes Erie, Inc. maintains documentation control QSP's as part of the QMS (Quality Management System). These QSP's apply to all procedures and other documentation required under environmental management system. Details of documents required by various regulations are maintained by SHE.

4.4.6 Operational Control

The operation of the manufacturing and associated processes in Hanes Erie, Inc. are controlled by Work Instructions. Environmental concerns may be addressed by including them in these Work Instructions.

Contractors are made aware of environmental consideration through their contractor orientation.

4.4.7 Emergency Preparedness and Response

The facility's Emergency Response Plan is established as part of its Hazardous Materials Plan. It is formally reviewed and updated annually, and on a periodic basis as needed.

4.5 Checking

4.5.1 Monitoring and Measurement

The on-going performance of the company, compliance with environmental legislation, reporting of the environmental aspects of the operations and the monitoring of targets, communications and improvements are achieved by means of advice of the Quality Manager and the Director of Quality.

The Quality Department updates significant activities regularly; this information is forwarded to senior staff of Hanes Erie, Inc..

4.5.2 Evaluation of Compliance

Records are maintained of all non-compliance with stated Environmental Policy and with requirements of the Environmental Management System whether caused by accident, faulty material or equipment failure. All incidents are investigated and the necessary corrective action implemented to avoid recurrence of the problem. Documentation is maintained by the Management Representative. The Preventative Maintenance System attempts to minimize the risk of incidents occurring through a regular program of maintenance activities.

4.5.3 Nonconformity, Corrective Action and Preventive Action

The Quality Manager will utilize the company nonconformity, corrective action and preventive action databases for:

- a) Identifying and correcting nonconformity(ies) and taking action(s) to mitigate their environmental impacts,*
- b) Investigating nonconformity(ies) determining their cause(s) and taking actions in order to avoid their recurrence,*
- c) Evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence,*
- d) Recording the results of corrective action(s) and preventive action(s) taken,*
- e) Reviewing the effectiveness of corrective action(s) and preventive action(s) taken'*

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

The Quality Manager will ensure that any necessary changes are made to the environmental management system, after a document change is recorded by the Document Coordinator, per QSP 4.2.4.

QSP's 8.3.1, 8.5.2 and 8.5.3 refer.

4.5.4 Control of Records

The Quality Manager is responsible for identifying the environmental management records that will be maintained by Quality in accordance with the requirements of the EMS, QMS, and QSP's; legal; and business practices. Records retained in the Quality Department and/or through the records retention program. (Refer to QSP 4.2.4 —Maintenance of Quality Records).

Human Resources maintains training records. Training records are maintained for an employee's term of service, plus one year.

4.5.5 System Audit

A program of planned and systematic audits is implemented by the CIA and Internal Audit Team, to ensure compliance with all aspects of the Environmental Management System and to maintain its continued effectiveness.

AUDIT PROGRAM

- *The CIA issues and maintains an annual schedule of planned audits, which can be amended. The frequency of the audit plan is based upon identified environmental aspects and components of the management system and runs from January through December, unless amended by the EMS Management Representative.*
- *The program covers key aspects of the environmental management system, environmental effects and frequency.*

AUDIT PERFORMANCE

- *The Environmental auditor examines, objectively, the evidence of compliance with the environmental management system. This may be with the use of a checklist or by following audit trails.*

AUDIT REPORT, DISTRIBUTION AND CLOSURE

- *The EMS Management Representative prepares and distributes the audit report and closes all audits as per QSP 8.2.2, Internal Quality Audits.*

4.6 Environmental Management Review

- *Twice a year meetings with Management are held. Members are responsible for addressing the EMS agenda as outlined below, and for addressing the possible need for changes.*
- *Previous environmental actions*
- *Environmental policy*
- *Objectives and targets*
- *Waste volume and waste disposal costs*
- *Energy usage and conservation efforts*
- *Audit results*
- *Communications with regulatory agencies*
- *Complaints from public or customers with respect to environmental performance*
- *Communications with additional external bodies on environmental aspects*
- *Training requirements*

ENVIRONMENTAL SYSTEM PROCEDURE & ENVIRONMENTAL SYSTEM WORK INSTRUCTION MATRIX	QSP 8.5.3 Preventive Action	QSP 8.5.2 Corrective Action	QSP 8.3.1 Control of Nonconforming Material	QSP 8.2.2 Internal Environmental Audits	QSP 8.1.3 Establishing Environmental Goals & Action Plans	QSP 8.1.2 Monitor and Measure	QSP 8.1.1 Environmental Objectives and Targets	QSP 7.5.1 Issue & Control of Process Monitoring And Operating Instructions	QSP 7.4.2 EMS Purchasing	QSP 7.4.1 Supplier Selection and Assessment	QSP 7.2.3 Environmental Communication	QSP 7.1.2 Product Quality Planning	QSP 7.1.1 Emergency Preparedness & Response	QSP 6.2.1 Training Awareness and Competence	QSP 5.6.4 Environmental Aspects	QSP 5.6.3 Legal and Other Requirements	QSP 5.6.2 Management Responsibility for EMS	QSP 4.2.4 Environmental Record Maintenance	QSP 4.2.3 Document Control	QSP 4.1.1 Environmental Policy	
WI 4.2.4.1 Data Backup																		X			
WI 6.2.1.1 Personal Protective Equipment													X								
WI 6.2.1.10 Hazard Communication													X								
WI 6.2.1.11 Hazard Waste Managements													X								
WI 6.2.1.12 Environmental Communication													X								
WI 6.2.1.2 Respiratory Protection Program													X								
WI 6.2.1.3 Crane program													X								
WI 6.2.1.4 Fire Plan													X								
WI 6.2.1.5 Forklift Safety													X								
WI 6.2.1.6 Gas Cylinder Handling and Installation													X								
WI 6.2.1.7 Hearing Conservation													X								
WI 6.2.1.8 Lockout Tag-out and Try													X								
WI 6.2.1.9 Spill Response													X								
WI 7.1.1.10 EMS Aspects Program													X								
WI 7.1.1.11 EMS Review of new Products													X								
WI 7.1.1.2 PPAP													X								
WI 7.1.1.3 EMS Risk Assessment													X								
WI 7.1.1.4 Hazardous Energy Control													X								
WI 7.1.1.5 Energy Conservation													X								
WI 7.1.1.6 EMS Derivation of Management program													X								
WI 7.1.1.7 Management Responsibility for EMS													X								
WI 7.1.1.9 Regulatory Review													X								
WI 7.2.3.1 Customer Communications																					X
WI 7.4.2.1 Contract Review																					X

ENVIRONMENTAL SYSTEM PROCEDURE & ENVIRONMENTAL SYSTEM WORK INSTRUCTION MATRIX	QSP 8.5.3 Preventive Action	QSP 8.5.2 Corrective Action	QSP 8.3.1 Control of Nonconforming Material	QSP 8.2.2 Internal Environmental Audits	QSP 8.1.3 Establishing Environmental Goals & Action Plans	QSP 8.1.2 Monitor and Measure	QSP 8.1.1 Environmental Objectives and Targets	QSP 7.5.1 Issue & Control of Process Monitoring And Operating Instructions	QSP 7.4.2 EMS Purchasing	QSP 7.4.1 Supplier Selection and Assessment	QSP 7.2.3 Environmental Communication	QSP 7.1.2 Product Quality Planning	QSP 7.1.1 Emergency Preparedness & Response	QSP 6.2.1 Training Awareness and Competence	QSP 5.6.4 Environmental Aspects	QSP 5.6.3 Legal and Other Requirements	QSP 5.6.2 Management Responsibility for EMS	QSP 4.2.4 Environmental Record Maintenance	QSP 4.2.3 Document Control	QSP 4.1.1 Environmental Policy		
WI 7.5.1.10 Preventive Maintenance								X														
WI 7.5.1.11 pH Testing								X														
WI 7.5.1.2 Tooling Management								X														
WI 7.5.1.3 Product Identification and Traceability								X														
WI 7.5.1.4 Verification and Control of Customer property								X														
WI 7.5.1.5 Product Preservation and Control								X														
WI 7.5.1.6 EMS Calibration								X														
WI 7.5.1.7 In-Process Inspection								X														
WI 7.5.1.8 Environmental Inspections								X														
WI 7.5.1.9 Final Inspection								X														
WI 8.1.2.1 Statistical Techniques							X															
WI 8.1.3.1 Customer/Environmental Satisfaction																						X
WI 8.3.1.1 NCMR (8D) Form																						