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Columbia Precast Products

In recognition of

**Columbia Achievement of SMaRT Platinum
Sustainable Product / EPP Certification for:**

Precast Concrete Products

May 2, 2017

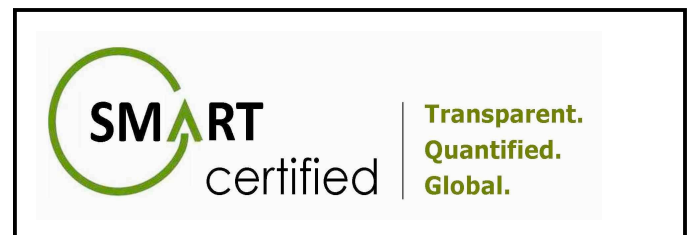
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Columbia Precast Products – 1765 Howard Way – Woodland, WA 98674 - Phone: 360-335-8400 - Fax: 360-335-8402

Environmental Manual

Revision: A

Date: April 2, 2017

Approvals _____

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Environmental Policy	

4.1 GENERAL REQUIREMENTS AND SCOPE:

Columbia Precast Products (CPP), Woodland, WA has established, documented, implemented, maintained and continually improved our environmental management system in accordance with the requirements of ISO14001:2015 international standard and determined how we are to fulfill the specified requirements.

In respect to this requirement the scope of our Environmental Management System has been defined and documented.

The scope of this Environmental Management System (EMS) is for Columbia Precast Products Manufacturing site located at:

Columbia Precast Products

1765 Howard Way

Woodland, WA 98674

Scope:

1.1 General

1.1.1 This environmental system applies to the precast concrete manufacturing facility for the underground utility construction industry and other industries based on the ISO 14001: 2015 requirements.

1.2 Application

1.2.1 CPP manufactures precast concrete products.

1.3 Exclusion:

1.3.1 The scope of the EMS at this site excludes all other manufacturing practices not related to precast concrete.

1.3.2 Columbia Precast Products does not perform any service work.

REFERENCE DOCUMENTATION:

EMS Manual

4.2 Environmental Policy Management

CPP has an environmental policy that defines management's policy to manage the environmental aspects of their operations. The policy:

- a) is appropriate to the nature, scale and environmental impacts of CPP's 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 the organization subscribes which relate to its environmental aspects,
- d) Provides the framework for setting and reviewing environmental objectives and targets,
- e) is documented, implemented and maintained,
- f) Is communicated to all person working for or on behalf of the organization, and
- g) is available to the public

The environmental policy is posted in the plant(s) per the distribution list associated with them.

RELEVANT DOCUMENTS

Appendix 1 – Environmental Policy

4.2 Planning

4.2.1 Environmental Aspects

CPP has established, implemented and maintained a procedure (EMSP001) that:

- a. Identifies the environmental aspects of our activities, products, and services within the defined scope of the environmental management system that we can control and over which we can be expected to have influence, taking into account planned or new developments or new or modified activities, products and services and

- b. To determine those aspects which have (or can have) significant impact(s) on the environment.

CPP documents this information on EMSF001 and keeps it up to date. Significant Aspects are summarized on.

CPP ensures that the significant environmental aspects are taken into account in establishing, implementing and maintaining our environmental management system.

4.2.2 Legal and other requirements

CPP has established, implemented and maintained a procedure (EMSP002):

- a. to identify and have access to the applicable legal requirements and other requirements to which the organization subscribes related to its environmental aspects and

- b. To determine how these requirements apply to our environmental aspects.

CPP ensures that these applicable legal requirements and other requirements to which we subscribe are taken into account in establishing, implementing and maintaining its Environmental Management System.

- At CPP we access the federal, state, and local legal requirements through the internet.

- Local – the EHS Management representative remains informed of local regulations through attending local council meetings or reviewing council meeting minutes in the towns/counties where the plants are located.

4.2.3 Continuous Improvement Process - Objectives, targets and programs

CPP is committed to the continuous improvement of its' environmental performance and EMS system. Improvements in environmental performance will be accomplished

through the establishment and documentation of environmental objectives and targets, monitoring significant environmental aspects, and regular EMS communications.

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

CPP has ensured our objectives and targets are measurable where practicable and consistent with the environmental policy including the commitments to 1) prevention of pollution, 2) to compliance with applicable legal requirements and with other requirements to which the organization subscribes and 3) to continual improvement.

When establishing and reviewing its objective and targets CPP takes into account the legal requirements and other requirements to which we subscribe and our significant environmental aspects. CPP also considers our technological options, financial, operational and business requirements and the views of interested parties.

CPP also has established, implemented and maintained a program for achieving our objectives and targets. This program includes:

- a. Designation of responsibility for achieving objectives and targets at relevant functions and level of our organization and
- b. The means and time frames by which they are to be achieved.

Each objective & target and associated program will be documented on EMSF003.

The EMS team will meet on a quarterly basis to discuss progress of objectives/targets, identify improvements to the EMS, and implementation of corrective actions. CPP will also maintain a continuous improvement log to track incremental improvements in the EMS processes.

REFERENCE DOCUMENTATION:

EMSP001	Aspects, Targets and Objectives
EMSP002	Legal and Other Requirements
EMSF001	Matrix Aspects, Impacts and Significant Aspects Identification

EMSF002	Summary of Significant Aspects, Operational Controls, Monitoring & Measurement
EMSF003	Environmental Regulations and other Requirements Listing
EMSF004	Objectives & Targets and Programs

4.3 IMPLEMENTATION AND OPERATION

4.3.1 Resources, roles, responsibility and authority

CPP ensures the availability of resources essential to establish, implement, maintain and improve the environmental management system. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

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

CPP's top management has appointed a specific management representative who irrespective of other responsibilities has defined roles, responsibilities and authority for:

- a. Ensuring that an EMS is established, implemented and maintained in accordance with the requirements of the ISO 14001 international standard.
- b. Reporting to top management on the performance of the EMS for review, including recommendations for improvement.

The following personnel and teams have a key role in the EMS:

Vice President/General Manager: Is the senior level manager for all operations covered within the scope of the management system and responsible for providing resources for development and maintenance of the EMS.

Plant Manager: Is the environmental management representative (EMR) and has overall responsibility for the implementation and maintenance of the EMS

EMS Team: The EMS provides direct support to the EMR and assists with the development and maintenance of the EMS. The General Manager, Plant Manager, Controller, and Quality Control Manager

Vice President/General Manager: Has primary responsibility for legal requirements and regulatory compliance.

Controller: Has primary responsibility for the identification and tracking of all employee training including ISO 14001 awareness training, hazard communications training and emergency response planning.

Plant Manager: Has primary responsibility for waste management and control of utilities.

All Employees: Have the responsibility to conduct their jobs in a manner to support the EMS policy including the prevention of pollution, legal compliance, and continuous improvement.

Other roles and responsibilities will be defined within the EMS as required.

4.3.2 Competence, training and awareness

CPP has ensured that any persons performing a task on our behalf that may have the potential to cause a significant environmental impacts identified by the organization are competent on the basis of appropriate education, training or experience and we retain these associated records.

CPP has identified training needs associated with our environmental aspects and our EMS. The training requirements are identified on our Training Matrix (EMSF-0007). We provide training or take other action to meet these needs and retain associated records accordingly.

CPP has established, implemented and maintained procedures to make persons working for us (or on our behalf) aware of:

- a. The importance of conformity with the environmental policy and procedures and with the requirements of the EMS
- 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 if the EMS and
- d. The potential consequences of departure from specified procedures.

This information is covered in our ISO 14001 General Awareness program. This training provides all employees with an understanding of the EMS policy, their role in supporting the policy, understanding of significant aspects they impact, and other EMS information.

4.3.3 Communication

With regard to its environmental aspects and EMS CPP has established, implemented and maintained a procedure for internal and external EMS Communication (EMSP-003). This procedure defines:

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

CPP management has decided not to communicate externally about our significant environmental aspects. However, when information on our environmental activities is requested, top management will consider these on a case-by-case basis and the response will be documented.

4.3.4 Documentation

CPP's EMS documentation includes:

- a. The environmental policy, objectives and targets

- b. A description of the scope of the EMS
- c. A description of the main elements of the EMS and their interaction and reference to related documents
- d. Documents, including records, required by ISO 14001 international standard and
- e. Documents, including records, determined by CPP to be necessary to ensure the effective planning, operation and control of processes that relate to its significant environmental aspects.

This manual is the Level 1 EMS documentation that provides clear linkage to all elements of the EMS.

4.3.5 Control of documents

Documents required by the EMS and by ISO14001 international standard are controlled. Records are a special type of document and are controlled in accordance with the requirements given in 4.5.4.

CPP has established, implemented and maintained 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 EMS 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.

Procedure EMSP-005 defines process used to control documents.

4.3.6 Operational control

CPP identifies and plans those operations that are associated with the identified significant environmental aspects consistent with our environmental policy, objectives and targets, in order to ensure that they are carried out under special conditions by:

- a. Establishing, implementing and maintaining a documented procedures to control situations 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 CPP and communicating applicable procedures and requirements to suppliers, including contractors.

Operational Control Work Instructions have been developed for the following activities:

- EWI001 By Product Management
- EWI002 MSDS Management
- EWI003 Contractor Control
- EWI004 Add additional WIs

The preventative maintenance (PM) process will be used to monitor equipment and provide for scheduled maintenance activities. Well maintained equipment will help minimize energy conservation and potential environmental impacts. The emergency response equipment will be maintained in the PM system.

4.3.7 Emergency preparedness and response

CPP has established, implemented and maintained a procedure (EMSP006) to identify potential emergency situations and potential accidents that can have an impact(s) on the environment and how we will respond to them.

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

CPP periodically reviews and where necessary revises our emergency preparedness and response procedures in particular after the occurrence of accidents or emergency situations.

CPP also periodically tests such procedures (where practicable).

CPP has developed an emergency response plan (ERP) that plan response actions for building evacuation, fire, severe weather, chemical spills, and power outages. The ERP defines responsibilities and procedures for handling these events. These procedures will be periodically tested and the effectiveness of the plans evaluated.

REFERENCE DOCUMENTATION:

EMSP003	Training, Awareness, and Competency
EMSP004	Internal and External EMS Communications
EMSP005	Document Control
EMSP006	Emergency Response Plan
EWI001	By Product Management
EWI002	MSDS Management
EWI003	Contractor Control
EMST001	Training Record
EMST002	Outside Storage Inspection
EMST003	Manifest Tracking Log

Preventive Maintenance System

4.4 CHECKING

4.4.1 Monitoring and Measurement

CPP has established implemented and maintained procedure to monitor and measure on a regular basis the key characteristics of our operations that can have a significant environmental impact. The EMS team has reviewed the identified significant environmental aspects and identified the monitoring and measure requirements on Summary of Significant Aspects, Operational Controls, and Monitoring & Measurement (EMSF002). Additional monitoring with be conducted to monitoring the objective & targets and these will be defined within each documented programs. Environmental performance will be monitored by establishing key performance indicators and tracking information to monitor performance.

The preventative maintenance (PM) process will be used to monitor equipment and provide for scheduled maintenance activities. Well maintained equipment will help minimize energy conservation and potential environmental impacts. The emergency response equipment will be maintained in the PM system.

CPP ensures that calibrated or verified monitoring and measurement equipment is used and shall retain associated records. Calibration requirements are summarized on EMSF002.

4.4.2 Evaluation of Compliance

4.5.2.1 Consistent with our commitment to compliance ABC has established, implemented and maintained a procedure(s) for periodically evaluating compliance with applicable legal requirements.

CPP keeps records of the results of these periodic evaluations.

4.5.2.2 CPP evaluates compliance with other requirements to which we subscribe. These evaluations may be combined with the legal compliance evaluations as referred to in 4.5.2.1 or may involve a separate procedure.

Records of these periodic evaluations are maintained.

The legal and other requirements are identified on EMSF003. Every 3 years CPP will review operations to determine compliance with these requirements. The results of these audits will be documented and any identified non-compliance issues documented in the corrective action process.

CPP will also evaluate compliance periodically through the internal audit process, safety inspections, and routine inspections.

4.5.3 Non-conformity, corrective and preventive action

CPP has established, implemented and maintained a procedure(s) for dealing with actual and potential non-conformities and for taking corrective action and preventive action. The procedure(s) defines requirements for:

- a. Identifying and correcting non-conformities and taking action(s) to mitigate their environmental impacts.
- b. Investigating non-conformities, determining their cause(s) and taking actions in order to avoid their recurrence.
- c. Evaluating the need for action(s) to prevent non-conformities 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 actions(s).

Actions taken are taken to the magnitude to the problems and the environmental impacts encountered.

CPP also ensures that any necessary changes are made to the EMS documentation.

4.5.4 Control of records

CPP has established and maintained records as necessary to demonstrate conformity to the requirements of its EMS and of the ISO 14001 international standard and the results achieved.

CPP also has established, implemented and maintained a procedure(s) for the identification, storage, protection, retrieval, retention and disposal of records.

- Records at CPP are to remain legible, identifiable and traceable.

4.5.5 Internal audit

CPP has ensured internal audits of the EMS are conducted at planned interval to

- a. Determine whether the EMS
 1. Conforms to planned arrangements for environmental management including the requirements of the ISO 14001 international standard and
 2. Has been properly implemented and maintained and
- b. Provide information on the results of audits to management

Audit programs are planned, established, implemented and maintained by CPP taking into consideration the environmental importance of the operation(s) concerned and the results of previous audits.

Audit procedure(s) are established, implemented and maintained that address

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

Selection of auditors and conduct of audits ensure objectivity and the impartiality of the audit process.

REFERENCE DOCUMENTATION:

EMSP007	Corrective and Preventative Actions
EMSP008	Internal Audit
EMSF002	Summary of Significant Aspects, Operational Controls, Monitoring & Measurement
EMSF003	Environmental Regulations and other Requirements Listing
EMSF005	Master Document List and EMS Record Retention
EWI005	Waste Handling

Compliance Audit Records

4.6 MANAGEMENT REVIEW

Top management reviews CPP EMS at planned intervals to ensure its continuing suitability, adequacy and effectiveness. CPP will conduct a complete management review at least annually.

Reviews include assessing opportunities for improvement and the need for changes to the EMS, including the environmental policy and environmental objectives and targets. Records of the management reviews are retained.

Input to management reviews includes:

- a. Results of internal audits and evaluations of compliance with legal requirements and with other requirements to which CPP subscribes.
- b. Communication(s) 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 developments in legal or other requirements related to its environmental aspects and
- h. Recommendations for improvement

The outputs from management reviews include any decisions and actions related to possible changes to environment policy, objectives, targets and other elements of the EMS, consistent with the commitment to continual improvement.

REFERENCE DOCUMENTATION:

EMSF006 Management Review Checklist and Template

Change History:

Date	Rev.	Comments:
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03/15/2017 A

Original EMS Manual

Environmental Policy

The CPP Manufacturing site manufactures precast concrete products for the underground utility and other industries. CPP is committed to the following environmental principles:

- Continual improvement of our Environmental Management System (EMS) achieved through the use of common sense, Engineering, Maintenance, Manufacturing practices, personnel training and education, and interactive participation between all personnel in the plant.
- Support of pollution prevention.
- Management practices and environmental procedures that comply with ISO 14001 to meet our objectives and targets. The EMS objectives and targets are periodically reviewed.
- Compliance with all applicable environmental legal and other requirements.

Approved By:

Title: __Vice President/General Manager____ **Title:** __Plant
Manager_____

DISTRIBUTION LIST:

Copy 1	Main Lobby
Copy 2	Manufacturing Building

List of Specifications for manufacturing precast concrete products.

Manufacturing Standards

ASTM C478 (Standard Specification Circular Precast Reinforced Concrete Manhole Sections)

ASTM C1433 (Standards for Precast Concrete Monolithic Box Culvert Sections)

ASTM C858 (Standard for Underground Precast Concrete Utility Structures)

Raw Materials

ASTM C150 (Standard Specification for Portland Cement)

ASTM C618 (Standard Specification for Coal Fly Ash and Raw or Calcined Natural Pozzolan for Use in Concrete)

ASTM C989 (Standard Specification for Ground Granulated Blast-Furnace Slag for Use in Concrete and Mortars)

ASTM C33 (Standard Specification for Concrete Aggregates)

ASTM C260 (Standard Specification for Air-Entraining Admixtures for Concrete)

ASTM C494 (Standard Specification for Chemical Admixtures for Concrete)



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EMSF001 – Matrix Aspects, Impacts and Significant Aspects ID

Purpose: Identify matrix, impacts, and significant aspects identification

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Matrix:

1. EPA regulations as published annually by the EPA
2. 70% or greater suppliers that have at least one of the following:
 - a. EMS program
 - b. Sustainable materials program
 - c. Have met LEED and SMaRT certification requirements

Impacts and significant aspects identification:

1. VOC's
2. SDS Data
3. Distance (in miles) from our facility

EMSF002 – Summary of Significant Aspects, Operational Controls, Monitoring and Measurement

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Activities:

1. Purchasing materials – CPP takes into account a given vendors commitment to sustainable practices and considers this during the decision making process.
2. Handling materials – CPP handles its materials in accordance with the applicable SDS information on a given product.
3. Disposing of materials – CPP disposes of its excess materials to an appropriate recycling center.

Products:

1. CPP manufactures its products utilizing raw materials and ancillary materials that have been vetted by Management and deemed to be appropriate for use within the guidelines of our EMS.

Operational Controls:

1. Managers, as detailed in EMS must:
 - a. Approve all potential vendors
 - b. Quarterly reviews with employees regarding the handling of materials
 - c. Quarterly review of disposal program.

Monitoring and Measurement:

1. Managers, as detailed in EMS must:
 - a. Review process on a monthly basis
 - b. Review MFG equipment calibrations annually.
 - c. Compare results with EMS program policies.



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EMSF003 – Environmental Regulations Listing

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Listing:

1. EPA – TSA reporting/air monitoring program

EMSF004 – Objectives and Target Program

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Objective: To comply with EPA TSA air monitoring program requirements.

Target: Reduce emitting silica into the air at a lower than required level.

Program:

1. CPP shall maintain bag houses and ventilation system in accordance with manufacturer recommendations.
2. CPP shall check and monitor all systems on a monthly basis.



EMSF005- Master Documentation List and EMS Record Retention

Date Filed:	Document	Approved By:	Reviewed by:
3/25/2017	EMSF001	RBS	GG
3/25/2017	EMSF002	RBS	GG
3/25/2017	EMSF003	RBS	GG
3/25/2017	EMSF004	RBS	GG
3/25/2017	EMSF005	RBS	GG
3/25/2017	EMSF006	RBS	GG
3/25/2017	EMSF007	RBS	GG
3/25/2017	EMSP001	RBS	GG
3/25/2017	EMSP002	RBS	GG
3/25/2017	EMSP003	RBS	GG
3/25/2017	EMSP004	RBS	GG
3/25/2017	EMSP005	RBS	GG
3/25/2017	EMSP006	RBS	GG
3/25/2017	EMSP007	RBS	GG
3/25/2017	EMSP008	RBS	GG
3/25/2017	EWI001	RBS	GG
3/25/2017	EWI002	RBS	GG
3/25/2017	EWI003	RBS	GG
3/25/2017	EWI004	RBS	GG
3/25/2017	EWI005	RBS	GG
3/25/2017	EMST001	RBS	GG
3/25/2017	EMST002	RBS	GG
3/25/2017	EMST003	RBS	GG

Notes:



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EMSF006 - Management review and Checklist Template

Date:	Issue Reported	Reported by

(Initial)					
Reviewed					
Mgr review					
Changes?	Yes		No		
Revised	Date				
Reviewed					
Mgr review					
Issued	Date				
Filed	Date				
Notes:					

EMSP001 - Environmental Aspects.

Purpose: Identify environmental aspects of our activities, products, and services.

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Activities:

4. Purchasing materials – CPP takes into account a given vendors commitment to sustainable practices and considers this during the decision making process.
5. Handling materials – CPP handles its materials in accordance with the applicable SDS information on a given product.
6. Disposing of materials – CPP disposes of its excess materials to an appropriate recycling center.

Products:

2. CPP manufactures its products utilizing raw materials and ancillary materials that have been vetted by Management and deemed to be appropriate for use within the guidelines of our EMS.

EMSP002 – Legal Requirements

Purpose: Identify legal requirements applicable to CPP

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Requirements:

1. SEPA Stormwater Discharge – permitted prior to construction.
2. EPA – PTI annual reporting

EMSP003 – Training, Awareness, and Competency

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Training:

1. Employees are trained:
 - a. In accordance with EMS Policy
 - b. At time of hire
 - c. Annually in conjunction with Safety Meetings

Awareness:

1. EMS policy published and available:
 - a. In Break Rooms
 - b. In Main office
 - c. In Logistics office

Competency:

1. Management shall:
 - a. Commit to implementation of EMS program
 - b. Incorporate EMS into regular staff meetings

EMSP004 – Communication

Purpose: Identify communication processes, both internal and external

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Internal Communication:

1. Internal communication shall be as follows:
 - a. Employee to supervisor
 - b. Supervisor documents
 - c. Supervisor reports to appropriate Manager
 - d. Manager submits for review by VP/GM

External Communication:

1. External communication shall be as follows:
 - a. Request received and documented
 - b. Employee to supervisor
 - c. Supervisor documents
 - d. Supervisor reports to appropriate Manager
 - e. Manager submits for review by VP/GM
 - f. VP/GM determines on a case by case basis if external communication is necessary.

EMSP005 – Document Control

Purpose: Identify Document Control

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Document Control

1. Document approval – initial and date in upper right hand corner of document, page 1.
 - a. Must be reviewed and approved by Manager or Controller.
 - b. Final approval by VP/GM
2. Calendar year review of documents – No Change, initial and date in upper right hand corner of document, page 1.
 - a. Must be reviewed and approved by Manager or Controller.
 - b. Final approval by VP/GM
3. Calendar year review of documents – Change
 - a. Must be reviewed and approved by Manager or Controller.
 - b. Final approval by VP/GM
 - c. Previous version shall be “struck out” with the wording “obsolete document (OD)” written on all pages of document.
 - d. New version shall be filed appropriately
 - e. Old version shall be reviewed by VP/GM prior to filing.
4. Documents shall be kept for a minimum 3 calendar years.

EMSP006 – Emergency Response

Purpose: Emergency Response

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Emergency response:

1. Emergency response shall be in accordance with CPP Safety and Environmental program as required by OSHA.

EMSP007 – Corrective and Preventative Actions

Purpose:

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Corrective and Preventative Actions:

2. Identify and/or visually inspect the incoming materials.
 - a. If meet specifications, sign packing slip and place in receiving area.
 - b. If does not meet specifications
 - i. Stop shipment from being unloaded
 - ii. Notify purchasing agent
 - iii. Notify Plant Manager
 1. Plant Manager Review and:
 - a. Not accept shipment
 - b. Report non-conformity to supplier
 2. Inform EMS Managers
 - a. Review issue
 - b. Discuss with supplier
 - c. Evaluate potential other suppliers
 - d. Determination

EMSP008 – Internal Audit

Purpose:


Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Review EMS: Review CPP's EMS program on an annual basis, in January.

1. Review current ISO 14001 requirements
 - a. Identify changes
 - b. Make necessary changes for review by EMS Managers
2. Audit
 - a. Purchasing and receiving process
 - b. EPA regulations being met.
 - c. Training
 - d. EMS program's implemented and maintained
3. Report
 - a. Results reported to EMS Manager Team
 - b. Results compared to previous Audits



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EMST001 - Training Log		
Date:	Description	Instructor



EMST002 - Outside Inspection

Date:	Area Inspected	Inspector

Notes:



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EMST003 - Manifest Tracking

Date:	Issue Reported	Reported by

Notes:						

EWI001, 002, 003, 004 – Work Instructions

Purpose: Operational Control Work Instructions:

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

3. EWI001 – By Product Management
 - a. Product shall be reviewed by highest ranking manager onsite.
 - b. If product is deemed to be potentially environmentally hazardous:
 - i. Stop processes affected immediately
 - ii. Notify the VP/GM
 - iii. If VP/GM not available, notify closest Manager.
4. EWI002 – SDS Management
 - a. SDS must be on file or provided at time of delivery.
 - b. If SDS not on file or provided at time of delivery.
 - i. Stop processes affected immediately
 - ii. Notify the VP/GM
 - iii. If VP/GM not available, notify closest Manager.
5. EWI003 – Contractor Control
 - i. Onsite Contractors must be vetted by Manager prior to performing work on site.
6. EWI004 – Add additional WI's
 - a. Proposed WI's shall be:
 - i. Submitted to management in written form
 - ii. Reviewed by management
 1. Management to follow procedures in EMSP005

EWI005 – Waste Handling

Purpose: Identify the handling of Waste

Columbia Precast Products manufactures precast concrete products for the underground utility construction industry.

Waste Handling – To be sent off-site for processing on a semi-regular basis

1. Concrete
 - a. Determine if waste has steel reinforcing and dispose in appropriate bin.
 - i. Waste bunker #1 – Concrete with not steel
 - ii. Waste Bunker #2 – Concrete with steel
 - b. At Plant Manager discretion empty Waste Bunkers
 - i. Utilizing Loader, load third party dump truck.
2. Slurry
 - a. Dispose in Waste Bunker #1
3. Form Oil
 - a. Dispose in 55 gallon drum marked “waste form oil”
4. Hydraulic Oil
 - a. Dispose in 55 gallon drum marked “waste hydraulic oil”
5. Misc. other material
 - a. Plant Manager to give directive on placement of material.

February 28, 2017

Columbia Precast Products SMaRT Carcinogen Policy:

Columbia Precast Products does not, and will not generate the carcinogens listed in the SMaRT Carcinogen Policy, as recognized by the International Agency for Research on Cancer (IARC) Class 1 (known) and 2a (probable), and Rotterdam Convention on Toxic Chemicals (listed in the attached SMaRT Carcinogen Policy), in the manufacture, sale, use, reuse, and end of life of the product and its constituent materials over the global supply chain and all product stages. This Policy restricts the carcinogens in the list below to user exposure to less than the NOAEL (No Observable Adverse Effect Level) or zero if the NOAEL is unknown.

Any new chemicals added to the Stockholm or Rotterdam Conventions, or IARC lists, automatically become part of this Policy.

REACH Toxic Chemicals.

The following European REACH lists of toxic chemicals are also a required component of this Carcinogen Policy:

Six Substances of Very High Concern

http://ec.europa.eu/enterprise/newsroom/cf/itemdetail.cfm?item_id=4907

REACH Authorization List of 14 Toxic Chemicals

<http://echa.europa.eu/web/guest/addressing-chemicals-of-concern/authorisation/recommendation-for-inclusion-in-the-authorisation-list/previous-recommendations/2nd-recommendation>

Reach Toxic Chemical Candidate List

<http://echa.europa.eu/web/guest/candidate-list-table>

Chemical Ingredients:

Columbia Precast Products has published the complete content inventory for products following these guidelines:

- A publically available inventory of all ingredients identified by name and Chemical Abstract Service Registration Number (CASRN)
- Materials defined as trade secret or intellectual property may withhold the name and/or CASRN but must disclose role, amount and GreenScreen benchmark as defined in GreenScreen v1.2:
http://www.cleanproduction.org/library/greenScreenv1-2/GreenScreen_v1-2_Benchmarks_REV.pdf

Supply Chain Optimization (toxic chemicals):

Engage in validated and robust safety, health, hazard, and risk programs. Document at least 99% by weight of the ingredients used to make the product or material are sourced from companies with independent third party verification of the following along the manufacturer supply chain:

- Processes are in place to --
 - communicate and transparently prioritize chemical ingredients along the supply chain according to available hazard, exposure and use information to identify those that require more detailed evaluation
 - identify, document, and communicate information on health, safety and environmental characteristics of chemical ingredients
 - implement measures to manage the health, safety and environmental hazard and risk of chemical ingredients
 - optimize health, safety and environmental impacts when designing and improving chemical ingredients
 - communicate, receive and evaluate chemical ingredient safety and stewardship information along the supply chain
- Safety and stewardship information about the chemical ingredients is publicly available from all points along the supply chain.