

# ENVIRONMENTAL ASPECT / IMPACT ANALYSIS

1) **SCOPE:** This procedure applies to all Uchiyama Manufacturing America LLC team members.

2) **DEFINITIONS:**

- Environmental Aspect:** Element of an organization's activities, products or services that can interact with the environment. (ex: chemicals, paper, heat, electricity, etc.)
- Environmental Impact:** Any change to the environment, whether adverse or beneficial, wholly or partial resulting from organization's environmental aspects.
- MAJOR Aspect:** Any aspect that has or can have one or more significant environmental impact(s).
- Master Chemical List:** List of ALL aspects in the building. This is kept electronically on the shared drive in a folder called "MASTER SDS BOOK", and on the parts room floor computer.
- Aspect List:** Master Chemical List(LI03-001) for individual departments list of aspects in that department. These shall be kept on each department computer for reference.

3) **RESPONSIBILITY / AUTHORITY:**

- a) Each department shall establish the activities to be evaluated in the aspect and impact analysis.
- b) On an on-going basis, the top management and department supervisors / leaders are responsible for identifying changes in activities and products that create new environmental aspects, or invalidate previously identified aspects.
- c) The PESM are responsible for collecting / coordinating information regarding environmental aspects and for maintaining the Master Chemical List (LI03-001).

4) **ASPECT RATINGS**

- a) Each aspect that is documented is scored in 6 categories using the system shown below:
- b) Major aspects
  - i) Any aspect rated 17 or higher
  - ii) Any aspect management deems Major no matter what rating

Category		High(3)	Medium(2)	Low(1)	None(0)
Frequency of Use		Weekly to Daily	Monthly to Weekly	Less than monthly	None
Severity of Impact	Health	Potentially life threatening/altering to humans (And/or rated 1 on SDS)	Danger of non- life threatening health effects to humans (And/or rated 2 on SDS)	Little impact to human health (And/or rated 3 or 4 on SDS)	No Impact (No health hazards identified on SDS)
	Env.	Potentially life threatening/altering to wildlife, or significant long term effects on the environment reversible >1 yr. (Anything rated 1 on SDS)	Danger of non-life threatening effects to wildlife short term effects on the environment reversible <1 yr. (Anything rated 2 on SDS)	Little impact to environment (Anything rated 3 or 4 on SDS)	No Impact (No environmental hazards identified on SDS)
Operational Controls		No Control	Backup Controls (i.e. Secondary containment etc.)	Administrative Controls (i.e. SOP's, Supervisor Checks, etc.)	Engineering Controls (i.e. Implement equipment, software programs, etc.)/ Not Applicable
Potential Regulatory/Legal Exposure (Section 15 on SDS)		Possible criminal action or significant fine	Notice of violation or fine	Issue not regulated or little possibility of violation (Anything regulated in outside countries)	None
Quantity		Tons/Month or SARA Listed	Tons/Year	Pounds/Year	None

5) **IDENTIFICATION OF ENVIRONMENTAL ASPECTS**

- a) Changes and development of new activities and products may invalidate previously identified environmental aspects or require the addition of new aspects.
  - i) Examples of such may include (but are not limited to):
    - ♦ Changes in processes / technologies
    - ♦ Implementation of new processes
    - ♦ Significant expansion / reduction of capacity
    - ♦ New suppliers / subcontractors
    - ♦ Plant addition or relocation
    - ♦ Changes in the surrounding community
    - ♦ Changes in laws and regulations
    - ♦ Management Review Meeting
    - ♦ Internal Audits
- b) The department supervisors / leaders are responsible for identifying changes in activities and products that either create new aspects or invalidate previously identified aspects and report data to the PESM (use Aspect Review Form (QF09-008))

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## **6) NEW ASPECT PROCEDURE**

- a) Any **NEW** aspects shall be submitted to the PESM for review (with the environmental committee, if necessary), **BEFORE** ordering the aspect **BY THE REQUESTOR** (the person requesting to purchase the aspect).
  - i) The Parts Clerk shall verify orders of aspects are listed on the Master Chemical List before ordering.
  - ii) In the event they are not on the Master Chemical List, the Parts Clerk shall return the request back to the requestor for them to submit the SDS request per section 6)b).
- b) Fill out the top section of the Aspect Review Form (QF09-008) with all information and SDS attached.
- c) Submit to the PESM for review.
- d) The PESM and a 2nd party shall review the SDS and record results on the Aspect Review Form (QF09-008). If the results of the review differ a 3rd person is required to review/score the aspect on the Aspect Review Form (QF09-008).
- e) If after the third person review is complete and there still is not a final review/score agreed upon, the Environmental Team will have a meeting and discuss until a final decision is agreed upon.
  - i) The reviewing personnel shall rate the aspect according to the SDS information and the chart in Section 4.
  - ii) The final approved / rejected shall be recorded.
  - iii) The PESM shall finish filling out the Aspect Review Form (QF09-008) and advise the requestor of the results.
  - iv) The PESM shall
    - 1. Update the Master Chemical List to provide Parts Clerk information to allow for approval of the purchase order.
    - 2. Update the Department Aspect List
    - 3. Update Tier II information on erplan as necessary
    - 4. Review / Update TRI information, if necessary, annotate Aspect Review Form.
    - 5. File the SDS in JJKeller online database, and per department computer that is needed.
    - 6. Start chemical usage per department in JJKeller.
  - v) If approved, the owner may then fill out a purchase order to purchase the aspect.
    - 1. Any special concerns (precautions, safety, PPE, disposal, etc.) recorded shall be implemented before arrival of new aspect.
  - vi) If rejected, the PESM shall discuss findings with all interested parties to address concerns and alternatives.
- f) Aspects without a SDS are scored with the same criteria as aspects that have a SDS.
  - i) Aspects will be listed on the Chemical Master List (LI03-001).
    - 1. Risk and opportunities will be considered for all aspects when rating.
    - 2. Review Aspect for possible Tier II Inclusion/Update.
    - 3. Review Aspect for possible TRI Chemicals.

## **7) REMOVAL OF ASPECT**

- a) The PESM will schedule an annual chemical review for departmental aspect list. This review is to validate that each chemical on the aspect list is still in use in the department.
  - i) The PESM will distribute Aspect lists to department supervisors to review and verify whether each chemical is still in use in the respective departments.
  - ii) Each supervisor shall annotate on the list chemicals that are no longer in use or make other notes that explain each situation in their department and return to the PESM.
  - iii) PESM shall use the list to remove usage from JJKeller and update the department aspect list and other appropriate documents as needed, i.e. Tier II report. (*Aspect Review Form is not Required in this Instance*).
- b) Between annual reviews, if someone determines there is no longer a need for an aspect (i.e., chemical), the owner shall fill out the Aspect Review Form (QF09-008), circle delete, and forward it to the PESM.
- c) The PESM shall:
  - i) Remove the aspect from the Master Chemical List for that Department.
  - ii) Remove the aspect from the Department Aspect List
  - iii) Stop departmental usage of the chemical in JJKeller by placing an end date under chemical usage.
  - iv) If there are no additional department usage - JJKeller - toggle to not include in the binder.
  - v) The above action will meet OSHA retention requirements for SDS' of a minimum of 30 years.

## **8) Life Cycle of Aspects**

- a) A life cycle perspective review shall be performed for each new aspect on the Aspect Review Form (QF09-008)