

I. PURPOSE:

Understanding the aspects and impacts of the onsite operations is necessary for the development of an environmental policy, setting environmental objectives and targets, and subsequent development of management programs and control programs to manage those aspects deemed significant, consistent with ISO 14001. An environmental aspect is defined as any element of the organization's activities and products which do or can potentially interact with the environment. An impact is any change to the environment, whether adverse or beneficial, resulting from the aspects. The determination of significance is decided by the organization..

II. SCOPE:

The following describes the procedures for identifying the environmental aspects and impacts, and related significance, of the activities and products associated with the manufacturing operation.

V. PROCEDURE:

The following is the procedure which will be utilized to identify the aspects and impacts and to determine significance. The following procedure has been prepared in accordance with ISO 14001 Section 4.3.1 and was utilized during the Initial Review and implementation of the ISO 14000 **Environmental Management System (EMS)** for the site.

The Initial Review is essentially a combination of studies, including variations of an environmental site assessment, regulatory compliance audit and environmental impact study. It should be noted that many of the procedures and activities conducted at the facility are controlled by external factors used in the various products, such as corporate policy with regard to packaging and ingredients, as well as Good Manufacturing Practice (GMP) standards. Accordingly, these policies and manufacturing standards must be taken into consideration when determining if the organization has influence over and can control the aspect.

For the implementation of this EMS, and then annually thereafter, an evaluation of the site to identify the environmental aspects and impacts of its activities and products. This procedure is coordinated by the Manager of Environmental Projects (MEP)

A. IDENTIFYING ASPECTS AND IMPACTS

1. Ascertains the area(s) of the organization to be evaluated.
2. Reviews the environmental aspects via interviews, site reconnaissance, and document review for the area or function defined. Considers waste streams generated (air, water, solid waste), energy exchange (energy used and energy released), resource consumption, community and interested stakeholder input, and human and ecosystem toxicity.
3. Lists the identified aspects.
4. Determines what are the actual and/or potential impacts.
5. Reviews the aspects and impacts list using the procedure described below in Section B to determine significance.

V. **PROCEDURE:** (Continued)

A. **IDENTIFYING ASPECTS AND IMPACTS** (Continued)

6. Maintains records pertaining to determination of the aspects and impacts of the onsite activities and products in accordance with this. This includes a comprehensive listing of the facility's environmental aspects and impacts.
7. Maintains a comprehensive list to be periodically added to using the preceding procedure described in Section V.
8. For new process or equipment additions and modifications, utilizes the preceding procedure based on information provided by the Project Engineer.
9. Identifies significant aspects which are listed again separately in a Significant Aspects List. This list is then used in the Objectives and Targets and Environmental Management Programs procedures. References this Significant Aspects list when considering Emergency Preparedness and Response procedure(s).

B. **SIGNIFICANCE DETERMINATION:**

1. Reviews listed aspects and selected aspects identified as *significant* in accordance with ISO 14001. An aspect will be evaluated for their significance using the following criteria and scoring. Aspects with a score of 15 or higher will be considered **significant**. However, regardless of score, regulated issues are identified under legal and other requirements and addressed accordingly.
 - a. **Frequency:**
 - 0 pts - None
 - 1 pt - Once during life of site
 - 2 pts - 2 yrs or greater
 - 3 pts - less than 2 years

V. **PROCEDURE:** (Continued)

B. **SIGNIFICANCE DETERMINATION** (Continued)

1. b. **Local Significance:** (continued)

- 0 pts - None
- 1 pt - State
- 2 pts - Regional
- 3 pts - Local

c. **Regulatory:**

- 0 pts - No
- 3 pts - Yes

d. **Public Perception:**

- 0 pts - None
- 1 pt - Some
- 2 pts - Mild
- 3 pts - Strong public reaction

e. **Severity of Environmental Damage:**

- 0 pts - None
- 1 pt - Insignificant
- 2 pts - Minor local/regional
- 3 pts - Major local/regional

f. **Pollution Prevention Opportunities:**

- 0 pts - None
- 1 pt - <1%
- 2 pts - 1-5%
- 3 pts - >5%