Environmental Management Manual
(Supplement to Quality Manual)

Environmental Policy

*Rainier complies with environmental laws and regulations.
We prevent pollution, reduce waste and continually improve our
Environmental Management System*

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Rainier respects and protects the Environment. To minimize the risk of Environmental Impact we monitor our Business Activities in respect to the following Aspects:

Waste generation
Hazardous Waste generation
Wastewater generation
Energy usage
Air Emissions
Transportation
Land use

Introduction

Sustainability is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Steve Johnson, past Administrator of the U.S. Environmental Protection Agency states: "We have a responsibility to sustain - if not enhance - our natural environment and our nation's economy for future generations." Sustainability at Rainier marries two important themes: that environmental sensitivity does not preclude economic success and that economic success must be ecologically viable now and in the long run.

1- Scope (Manual)

This manual outlines the methodology by which Rainier Industries LTD, Tukwila site, executes its Environmental Management System in compliance with ISO 14001, Third Edition, 2015-09-15

2- Normative References

- ISO 14001, Third Edition, 2015-09-15
- Numbers preceding topics correspond to the related section in the standard

3- Terms and Definitions

- **Life Cycle:** Interlinked Stages of production from supply chain through to end of product life and final disposal
- **Risks and Opportunities:** Potential adverse effects [threats] and potential beneficial effects [opportunities]
- **Environmental Impact**: Change to the environment whether adverse or beneficial
- **Obligation:** An action that must be carried out
- **Activity:** Action taken in the process of doing business
- **Interested Party:** Person or Organization that can effect or be effected by Rainer decisions or activities
- **Objectives:** Result to be achieved. Goal
- **Aspect:** Elements of an activity or product that interacts or can interact with the Environment and have Impact.

4- EMS Context

Internal Issues	External Issues
Equipment	Customers
Employees	Suppliers
Culture	Subcontractors
Waste Removal	Community
Hazardous Waste	Landfill
Control of Utilities	Regulations
Internal Environment	External Environment

Affects

Interested Parties	Marketing	Compliance	Outreach	Economic	Sales
Customers	x	x	x		
Rainier	x	x	x	x	x
Suppliers		x			
Neighborhood		x			
City of Tukwila		x	x		
King County		x	x		
State of Washington		x			
Federal		x			
International		x			

Scope (EMS)

From our beginning in 1896 manufacturing tents for the Klondike Gold Rush, Rainier has evolved into 4 Business Units: Display, Shelter, Shade and Retail. We are committed to working in partnership with all Interested Parties including Customers, Suppliers, Employees, and relevant Municipalities to govern our Environmental Impact, focusing on the balance between Environment, Society and Economy. Our intent is to fully understand the life cycle of our Activities so that we may determine where best to focus our energy and expenditures to achieve the highest Impact.

We welcome ideas and comments from all sources. Our method is to identify Suspect Activities observed or questioned by our employees and other Interested Parties using our ERP Case Entry form to document input for Consideration, track Actions, monitor Status, and record Results.

Suspect Activities are evaluated and may require action in one of the following areas:

- Facilities
- Supply Chain
- Human Resources
- Marketing
- Operations

Significance is evaluated and results brought to Management Review for Impact consideration. If it is determined that we can have a meaningful degree of control or influence, or if legal obligations apply, an action is initiated. Documentation is maintained in Case Entry and results reviewed by Management.

Our methods are designed to mitigate our impact on the Environment by evaluating Environmental Aspects throughout the Life Cycles of our Activities and our ability to Control or Influence them in positive ways that do not impair but aids in our Company growth as well as growth, health and safety of our employees and community.

We will communicate Management Review minutes to all employees through postings and highlights at daily Stand-Up meetings which cascade to all team members.

We will communicate our efforts and achievements to all interested parties in many ways, including:

- News Letters
- Press releases
- Postings
- Team Meetings

5- Leadership

Accountability for EMS is demonstrated through quarterly Management Review Meetings.

- Input from interested parties is considered
    - Case Entry

- Risk Analysis is assigned as appropriate
    - Risk Analysis Worksheet

- Based on Results of Risk Analysis, Actions are assigned as appropriate
    - Tracked in Case Entry

- Objectives and Action results are reviewed
    - Findings recorded in Case Entry

- EMS System Health Check by Area owners: Successes and Challenges
    Facilities: Waste removal and Energy Usage
    Supply Chain: Supplier Management
    Human Resources   Promote Environmental Programs
    Marketing: Mine survey DATA for Considerations

- Operations: Monitor and evaluate Activities. Encourage employee Input

6- Planning

Processes for identifying and analyzing Risk and Implementing Actions
- Case Entry- Risks, Opportunities and potential Emergency Situations
- Risk Analysis Worksheet
- New Equipment Evaluation Worksheet

7- Support

Support is evaluated and supplied through the Management Review Team

- Resources are provided based on results of analysis
- System Competence is considered based on:
    - Input form Interested Parties
    - Audit results
    - Effectiveness of Actions toward Environmental Objectives
    - Input from Management Review Team Members

- Communication:
    - Required Communications
        - Management Review minutes posted on Safety Board
        - Environmental Policy and Scope posted on Web Site[s]

    - Optional Communications include:
        - News Letter
        - Press releases
        - Postings
        - Team Meetings

8- Operation

Procedures and Forms specific to Environmental Management System

- Procedures:
    - 946-01 - Waste Management
    - 560-02 - EMS Aspect Management
    - 560-01 - Management Review
    - 932-01 - Compliance Management

- Forms:
    - Incident Report
    - Hazardous Waste
    - Dangerous Waste Training
    - New Equipment Evaluation
    - EMS related checklists
    - EMS related compliance logs
    - Emergency Spill Response
    - Waste Recycle Map

9- Performance Evaluation

EMS Management Review:

- Environmental Objectives are maintained in Management Review Minutes
- Factsheet is maintained to evaluate waste management and utility usage
- OFIs are tracked
- Misc. notes and activity are tracked in Management Review Minutes

10- Improvement

Nonconformities and Corrective Actions are Logged in Case Entry for evaluation per Non-Conforming Product Procedure 830-01 followed by Improvement Procedure 850-01 if appropriate.

Summary:

The intention of this manual is to document our Environmental Policy, provide an overview of our methodology and its compatibility with the ISO 2015 Standard. Please refer to related Procedures, Work Instructions, Forms and Obligation Documents for complete detail.

Appendix 1- EMS Documentation

Input from Interested Parties: Case Entry - EPICOR

- Link to Project - for tracking and extracting DATA
- Risk Assessment Form – Attach to Case
- Record narrative and status in Case Entry

External EMS Obligations: Project Entry – "EMS Obligations" - EPICOR

- Use Tasks to record and track renewal / reporting dates
- Attach record to Task. Permits, Reports, Waste Profiles, Instructions, etc.

Internal EMS Obligations:

- SDS database
- Annual SDS audits
- Regulatory Compliance Log
- Hazardous Waste Profiles – *Available on supplier Dashboard*
- Wastewater PH & Flow Meter Log
- EMS Walkthrough Checklist
- Waste Container Checklists
- Hazardous Waste Manifests
- Recycling Fact Sheet
- Incidents

Procedures: Rainier server/J/ Policies and Procedures/ QMS/Level 2 – Procedures

- Procedures pertaining to all business activity at Rainier Industries LTD
- Maintained by Quality Manager

Centrally Controlled Forms: Rainier server/J/ Policies and Procedures/ QMS/Level 4 – Forms/Centrally Controlled Forms

- Pertain directly to QMS and/or EMS
- Training record

Locally Controlled Forms: Rainier server/J/ Policies and Procedures/ QMS/Level 4 – Forms/Locally Controlled Forms

- Misc. forms used in various areas of accountability

Centrally Controlled Work Instructions- Rainier server/J/ Policies and Procedures/ QMS/Level 3 – Work Instructions/Centrally Controlled- Work Instructions

- Define steps in Procedures

Locally Controlled Work Instructions: Rainier server/J/ Policies and Procedures/ QMS/Level 3 – Work Instructions/Locally Controlled- Work Instructions

- Define steps for misc. topics