

Perform Air International Inc.
Administrative System Manual
Procedure III.15: Environmental Management System Planning

Revision	Revision Date	Revision Change
N/I	02/08/10	Initial Release/Re-Release
1	02/28/11	Revision to 5.8.1.1 thru 5.8.1.3 and 6.4 for format.
2	05/31/13	Revision to 5.1.3, 5.1.4.4, 5.3.1, 5.3.2, 5.7, 5.10 and 5.11 for grammar and clarification of procedure. Addition of 6.5.
3	07/01/13	Pagination of 3.1 thru 3.2 for consistency of format. Revision to procedure for clarification of responsibility and grammar.
4	01/31/19	Revision to 4.3 for grammar.

1.0 Purpose:

To ensure goals and objectives are determined and reviewed in order to monitor and measure the effectiveness of Environmental Management System Planning. To enhance the environmental management system to achieve improvements in overall environmental performance through the use of a continuous improvement program.

2.0 Scope:

All departments of Perform Air International Inc. as applicable.

3.0 Responsibility:

- 3.1** The maintenance of this procedure is the responsibility of the Executive Management.
- 3.2** Executive Management has the responsibility for ensuring requirements of this procedure are effectively implemented, controlled and reviewed.

4.0 Definitions:

- 4.1 Environmental Aspect:** An element of Perform Air International Inc. activities, products or services that can interact with the environment.
- 4.2 Environment:** Surroundings in which Perform Air International Inc. operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.
- 4.3 Environmental Impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from the company's activities, products or services
- 4.4 Environmental Objective:** Overall environmental goal, arising from the environmental policy, that Perform Air International Inc. sets itself to achieve and which is quantified where practicable.

Perform Air International Inc.
Administrative System Manual
Procedure III.15: Environmental Management System Planning

- 4.5 Environmental Policy:** Statement by Perform Air International Inc. of company intentions and principles in relation to its overall environmental performance which provides a framework for action and for setting environmental objectives and targets.
- 4.6 Environmental Target:** Detailed performance requirement, quantified where practical, applicable to the company or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
- 4.7 Environmental Performance:** Measurable results of the environmental management system, related to an organizations control of its environmental aspects, based on its environmental policy, objectives and targets.

5.0 Procedure:

5.1 Environmental Aspects:

- 5.1.1** The environmental aspects of the company are identified on the Environmental Aspects Table.
- 5.1.2** Significance, training requirements, and controls are identified on the Environmental Aspects Table.
- 5.1.3** The Engineering Department will update the table, as necessary, per this procedure.
- 5.1.4** The employees of Perform Air International Inc. will adhere to all Environmental Management System (EMS) standards and regulations relating to the processes they may be performing to include the following.
 - 5.1.4.1** When working with flammables and corrosives, all rags will be properly disposed of.
 - 5.1.4.2** A list of those items used within the company will be kept so all relevant employees are aware of what category they fit into.
 - 5.1.4.3** Perform Air International Inc. keeps the acquisition of these chemicals to a minimum so that they may be depleted prior to shelf life expiration.
 - 5.1.4.4** Limited purchase minimizes the requirement for pickup and disposal by an EPA compliant vendor. It is a goal of the company to keep this disposal to a minimum.

Perform Air International Inc.
Administrative System Manual
Procedure III.15: Environmental Management System Planning

5.1.4.5 Perform Air International Inc. will monitor and ensure requirements are met or exceeded for filtration of the paint booth.

5.2 Legal and Other Requirements:

5.2.1 The Management Representative will be kept current on standards and regulations through the use of websites, guidance materials, and periodicals available from the various government and environmental related organizations.

5.2.2 Revisions will be maintained via review of the federal and state websites prior to the internal audit of a particular area.

5.3 Objectives and Targets:

5.3.1 All employees are encouraged to submit objectives and targets at any time through the Corrective Action/Preventive Action system.

5.3.2 At the beginning of the year, all department managers will consider environmental aspects when documenting their goals and objectives for the upcoming year.

5.3.2.1 The goals and objectives by department are incorporated into the company business plan annually, and are reviewed at each management review meeting.

5.3.2.1.1 The targets are set within the framework of the company's continuous improvement program.

5.3.2.2 All department managers will submit their objectives and targets at the beginning of each calendar year.

5.3.2.2.1 Goals and objectives may be added to or amended during the year if any new developments or modified activities warrant the need.

5.3.2.3 Through the expanded use of the computerized system, Perform Air International Inc. will look at all possible ways to use electronic data as a tool to store required records electronically. This will in effect reduce the need for hard copies in paper format and ultimately reduce the amount of trash generated for disposal and the cost of paper products to the company. The goal is to preserve another of our natural resources by less consumption and pollution.

Perform Air International Inc.
Administrative System Manual
Procedure III.15: Environmental Management System Planning

5.4 Significant Impact:

5.4.1 Perform Air International Inc. has identified operations and activities that could have a significant environmental impact. Operational controls are processes, methods, systems, and equipment that safeguard the environment. These can be such things as:

5.4.1.1 Safety review processes

5.4.1.2 Special containers, packaging or storage

5.4.1.3 Communication requirements and equipment

5.4.1.4 Training programs.

5.5 The Management Representative is responsible for operations and activities associated with significant environmental impacts. All managers will take part in evaluating the need for the implementation of relevant operational controls. The following issues are considered in evaluating the need:

5.5.1 Legal and regulatory requirements

5.5.2 Severity of potential environmental impact

5.5.3 Relevance to the environmental policy and objectives

5.5.4 Cost, impact on productivity, and any other business related considerations.

5.6 The implementation of new operational controls can be added within the procedures of management programs for reaching goals and objectives. They may also be added as a Corrective Action Preventive Action (CAPA).

5.7 Environmental aspects as identified will be added to the Environmental Aspects Table. The identification of aspects can come from the Corrective Action/Preventive Action system, internal audits, or extrinsic audits. As each aspect is identified, the significance will be determined by the Quality Assurance Department, and documented with appropriate control put into place and noted on the Environmental Aspects Table.

5.8 Any actions carried out by employees of Perform Air International Inc. that could have a significant impact upon the environment will be accomplished per manuals, standard procedures or any other work instructions on how to complete an operation or activity.

Perform Air International Inc.
Administrative System Manual
Procedure III.15: Environmental Management System Planning

5.8.1 The company may have procedural documentation specific to the facility that may stipulate methods and operational criteria that will:

5.8.1.1 Minimize the use of materials, energy, or any other natural resource

5.8.1.2 Reduce the generation of waste

5.8.1.3 Decrease the risk of accidental releases or other incidents and promote safety.

5.8.2 Facility specific procedures will be reviewed and approved for use by the document and data control procedure.

5.9 Any supplier or sub-contractor of Perform Air International Inc. will comply with the specific procedure and meet the requirements as called out for in the contract.

5.10 Perform Air International Inc. uses a Preventive Maintenance Program form for the Skydrol and 5606 test stands to reduce the possibility of an accident occurrence that could have any type of environmental impact.

5.11 Inspection and maintenance of equipment used is covered under the Control of Monitoring and Measuring Equipment Procedure (QCM II.08).

6.0 Records:

6.1 Management Review Meeting Minutes

6.2 Company Business Plan

6.3 Preventive Maintenance Program (Form 55.02)

6.4 Environmental Aspects Table (Att.52.10)

6.5 Paint booth Preventive Checklist (Form 55.11)