

Environmental Management Manual

EXECUTIVE SUMMARY

This manual outlines the general policy concerning the continuous improvement of its environmental performance at Armstrong Manufacturing Company, Portland, Oregon. It contains the Environmental Policy Statement for the company. The manual also comprises a description of the environmental management system (EMS) as well as an explanation of the structure of the organization including who is in charge of the implementation and maintenance of the EMS. It explains how each requirement of ISO14001 will be handled in the company.

Every effort has been taken to ensure that the EMS builds upon existing management structures while avoiding duplication. The objective is not to make more work for Armstrong Manufacturing Company personnel but to promote effective environmental management. This can be achieved through a simple system with both documentation and bureaucracy kept to the minimum.

Benefits for the company in preparing and implementing this manual, include:

- Clarification of responsibilities.
- Support tool for training of new employees.
- Easier approval of licenses from environmental protection authorities.
- Useful for public relations purposes.

This EMS has top management commitment at Armstrong Manufacturing Company in support of enhanced environmental protection practices. This commitment has been made clear for all company personnel and contractors through the publication of the first environmental policy statement in December 2007.

Following on from the environmental policy, an initial environmental review of all operations at Armstrong Manufacturing Company was completed in January 2008 and training seminars were organized for all company personnel in February, 2008. A webpage has been developed which fully explains the Armstrong Manufacturing Company ISO14001 initiative and the progress to date.

Taking the findings of the initial environmental review, this manual provides detailed objectives and targets, explaining how they will be reached, with what resources and under whose responsibility. Under ISO14001, Armstrong Manufacturing Company is required to measure results of implementation in order to evaluate the correct application of the Environmental Policy Statement. This manual provides the framework for both implementation and performance evaluation.

In preparing this manual, all mandatory regulations, standards and codes of practice have been identified (see the report entitled "Identification of Legal and Other Requirements." This is the minimum that an EMS should attain. It is necessary to understand clearly the mandatory requirements and what must be done to comply with them. With the establishment of this EMS, Armstrong Manufacturing Company is seeking to promote itself as a leader of excellence with respect to the conservation of the environment, and with regard to both its production activities and day to day operations.

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AUTHORIZATION STATEMENT

This Manual is a statement of the organizational responsibilities and systems that have been implemented to maintain conformance with the requirements of the ISO14001 standard as part of Armstrong Manufacturing Company's environmental management system. Armstrong Manufacturing Company takes its environmental responsibilities seriously and expects all personnel to do the same. The Environmental Policy Statement, revised in February, 2008, lays the foundation of our environmental philosophy. Each member the Armstrong Manufacturing Company staff is expected to understand and comply with its provisions.

The requirements of this Manual apply to all personnel of Armstrong Manufacturing Company and its contractors who have been given responsibility for the implementation of the Environmental Management System (EMS) and all the procedures given or referenced in this manual. The relationship between the procedures and ISO14001 is explained in Section 7 of this manual.

The contents of this manual have been reviewed and approved by Senior Officers Management (SOM) Group. The contents of this manual is authorized and approved by the Director of Environment and Sustainable Development who functions as the EMS Coordinator for Armstrong Manufacturing Company.

Signed this day: January 14, 2008

Henry M. Armstrong, President
Armstrong Manufacturing Company

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SECTION 1: GENERAL PRINCIPLES

General

ISO 14001 – Section 4.1

Scope

In line with the requirements of ISO14001, this Manual identifies the environmental management procedures as well as the approach to identifying significant environmental aspects (direct and indirect, positive and negative) associated with activities at Armstrong Manufacturing Company

This Manual applies to all parts of Armstrong Manufacturing Company it's facilities and contractors (see page 13 for more details). The provisions of the EMS will be applied to administration, operations, transportation, storage and waste management.

Requirements of ISO14001

ISO14001 is a voluntary international standard developed by the International Organization for Standardization (ISO), based in Geneva, Switzerland. At its core, it sets the requirements for establishment of an environmental management system. The implementation of ISO14001 is a cyclical process requiring the development of a comprehensive environmental policy statement, a planning process to operationalize the policy, its implementation and operation, checking and implementing corrective action if needed, and management review – which feeds back to rewriting the environmental policy statement. A simplified representation of this process is shown in Figure 1 below.

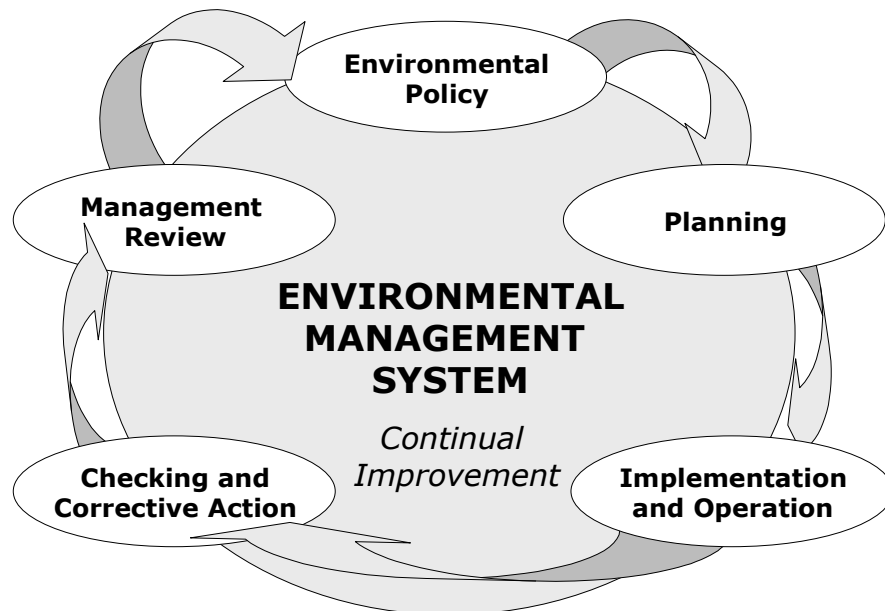
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Figure 1: Armstrong Manufacturing Company Environmental Management System under ISO14001

Some of the procedures required in order to obtain ISO14001 certification include:

- identification of significant environmental aspects
- identification of legal and other requirements
- internal and external communication and awareness building
- information collation and analysis
- operational control



- emergency preparedness and response
- monitoring and measurement of resource consumption
- equipment calibration
- evaluating legal and regulatory compliance
- maintaining records
- audit and management review

The main elements of ISO14001 are listed in Figure 2 below.

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