1. PURPOSE

The purpose of this document is to describe the method for identification of environmental aspects and impacts related to the products, activities and services at Nitto Denko Automotive in order to identify those aspects which are significant, and to set environmental objectives which support the documented environmental policy in accordance with the requirements of 14001:2004, 4.3.1 – Environmental Aspects.

2. SCOPE

This section of the environmental manual applies to all products, activities, and services as part of the Nitto Denko Automotive Environmental Management System.

3. DEFINITIONS

3.1 ENVIRONMENT - Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their relation.

3.2 ENVIRONMENTAL ASPECT - Element of an organization's activities, products or services that can interact with the environment.

3.3 ENVIRONMENTAL IMPACT - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.

4. RESPONSIBILITIES AND AUTHORITIES

4.1 EMR

4.2 Environmental Management Team – EMR, Human Resources Manager, Procurement Manager, Process Engineering Coordinator, Engineering Technician, Quality Engineering Coordinator, QA Technician, Production Control Coordinator and Production Specialists.

5. PROCEDURE

5.1 Members of the Environmental Management Team determine environmental aspects appropriate for the scope of activities performed at Nitto Denko Automotive, Chesapeake, VA. Environmental aspects are reviewed and assessed annually (at a minimum). Aspect/impact sampling information is updated whenever one of the following occurs:

a) Activities or other department-specific tasks are significantly changed or modified to the extent that the EMS is affected,
b) New processes and/or products that could affect the EMS are planned,
c) Changes related to the EMS resulting from corrective or preventive actions,
d) Applicable laws and regulations are enacted or revised, or,
e) Significant changes are made to the environmental policy.

5.2 Members of the Environmental Management Team identify product, activity and service aspects related to converting activities through review of Work Instructions, procedural requirements and other documents. Environmental concerns or impacts associated with various activities are identified and described in the aforementioned documentation as required.

5.2.1 The Environmental Management Team identifies and categorizes environmental aspects using the Environmental Impact Assessment Ranking. Values are assigned to potential risk factors, the potential for occurrence and Nitto Denko Automotives ability to detect measurable outputs related to aspects and associated impacts for services performed and products produced.

5.2.2 In addition to the listed aspect categories that are facility wide, the Environmental Management Team may include additional impacts based on functional requirements or physical areas where activities are carried out.

5.2.3 The Environmental Management Team considers aspects for normal and abnormal operation, such as set-up, breakdown or emergency (e.g. process shut-down) involved with specific processes or activities. The Environmental Management Team also considers positive impacts, which could mitigate and reduce the score of a specific identified aspect (e.g. the current recycling of a generated waste stream).

5.3 The EMR convenes all members of the Environmental Management Team to review the rankings in order to set objectives and targets for the environmental management programs.

5.3.1 The Environmental Management Team members assess and assign value to identified aspects/impacts by multiplying values assigned based on the following: Legal Requirements, Impact Severity, Probability of Occurrence, Scale of Impact and Impact Duration. The product of these values results in a Risk Assessment Number. Comparative analysis is performed to determine aspects and impacts considered to be significant.

5.3.2 Aspects with multiple impacts (e.g. spill potential, resource use) are individually identified and Risk Assessment Numbers are determined by impact.

5.3.3 The Environmental Management Team determines the values for ranking aspects as significant and the EMR records this value in meeting minutes or on assessment documents. Annual review of aspects may result in a change in significant scoring.

5.4 The EMR maintains all Environmental Management Team documents used to identify aspects and determine Risk Assessment Numbers for a minimum of three years.

6. REFERENCES:

6.1 Environmental Impact Assessment Ranking 4.3.1-01
6.2 Guidance for Aspect Ranking Criteria
6.3 Aspects & Impacts Reference Sheet 4.3.1-03

7. REVISION HISTORY

REV. LEVEL	DATE	CHANGES
00	02/18/08	Initial Manual Release
01	9/7/10	Updated job titles
02	12/6/10	Updated sections 5.1 and 5.3.1
03	1/31/11	Updated section 6.0