



SPARTAN MOTORS

**ENVIRONMENTAL
MANAGEMENT SYSTEM MANUAL**

**ENVIRONMENTAL MANAGEMENT
SYSTEM MANUAL
SPARTAN MOTORS USA, INC.
1000 REYNOLDS ROAD
CHARLOTTE, MICHIGAN 48813**

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1.0 INTRODUCTION




Spartan Motors USA, Inc. (Spartan) is located at 1000 Reynolds Road in Charlotte, Michigan. In order to improve management of environmental issues related to its operations and sites, Spartan is implementing an ISO 14001:2004-compliant environmental management system. This Environmental Management System (EMS) manual presents the environmental policy, structure of the management system, and related documents.

2.0 CROSS-REFERENCE TABLE

The EMS is designed according to the requirements set forth by the ISO-14001:2004 Standard and consistent with U.S. EPA's "Compliance-Focused Environmental Management System - Enforcement Agreement Guidance" (CFEMS) (Revised June 2005). Sections 4.1 through 4.6 parallel the ISO-14001 Standard number scheme (TABLE 1). Each of these sections and related documentation provide specific information or instructions necessary for complying with the requirements in the ISO-14001 Standard and Appendix B of CFEMS.

TABLE 1
ISO 14001 Cross-References

ISO 14001:2004 Element	Description	Applicable Documents Spartan Motors USA, Inc.
4.1	General Requirements	EMS-0001
4.2	Environmental Policy	EMS-0001
4.3.1	Environmental Aspects	 EMS-PD-0001.pdf
4.3.2	Legal and Other Requirements	 EMS-PD-0002.pdf
4.3.3	Objectives, Targets, and Environmental Programs	 EMS-PD-0003.pdf
4.4.1	Resources, Roles, Responsibilities and Authority	 EMS-PD-0004.pdf
4.4.2	Competence, Training and Awareness	 EMS-PD-0005.pdf
4.4.3	Communication	 EMS-PD-0006.pdf
4.4.4	Documentation	 EMS-PD-0007.pdf
4.4.5	Document Control	 EMS-PD-0007.pdf
4.4.6	Operational Control	 EMS-PD-0008.pdf
4.4.7	Emergency preparedness and response	 EMS-PD-0009.pdf
4.5.1	Monitoring and measurement	 EMS-PD-0011.pdf
4.5.2	Evaluation of compliance	 EMS-PD-0002.pdf
4.5.3	Nonconformance and corrective and preventative actions	 EMS-PD-0010.pdf

4.5.4	Records	 EMS-PD-0012.pdf
4.5.5	Environmental Management system internal audit	 EMS-PD-0013.pdf
4.6	Management Review	 EMS-PD-0014.pdf

3.0 DISTRIBUTION, REVISION AND CONTROL

The “Controlled Master Copy” is kept electronically in the Spartan Business System (SBS).

- Environmental Health and Safety will review the EMS manual for changes annually.
- Environmental Health and Safety will make all requested revisions to the manual as needed throughout the year.

4.0 ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) REQUIREMENTS

4.1 GENERAL REQUIREMENTS

Spartan will establish and maintain an environmental management system compliant with the ISO 14001 standard and focused on compliance.

The system will include the designation of responsibility for achieving objectives and targets at each relevant function and level of organization and means and time frame by which they are to be achieved. With any projects that relate to new developments or new or modified activities, products, or services, the system shall be amended where relevant

to ensure environmental management is applied to such projects.

4.2 SPARTAN MOTORS ENVIRONMENTAL HEALTH AND SAFETY POLICY

Spartan Motors is committed to Environmental, Health & Safety excellence. To this end, Spartan Motors will:

- Protect people and the environment by working to prevent accidents and pollution.
- Ensure our facilities and processes are compliant with applicable local, state, and federal regulations (environmental requirements), industry best practices, customer requirements, and other applicable requirements.
- Promote environmental and safety achievement through its leadership, and associate involvement across all locations.
- Establish, promote and drive toward specific performance goals to ensure continuous safety and environmental improvement.
- Provide personnel and resources to maintain a compliance-focused environmental, health and safety management system.

Spartan will ensure the environmental policy remains appropriate to the nature, scale and environmental impacts of its activities, products or services, including commitments to pollution prevention. Spartan will maintain compliance and provide a framework for setting and reviewing environmental objectives and targets by implementing the following procedures outlined in this document.

4.3 PLANNING

Spartan will ensure all activities affecting the environment are planned in a manner to minimize their impact. Legal requirements are taken into consideration when establishing, implementing and maintaining the EMS.

The following definitions are used during planning:

- **Environmental Aspects** - Elements of the organization's activities, products or

services that can interact with the environment.

- **Environmental Impact** - Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.
- **Significant Environmental Aspect** - An environmental aspect (interaction) that has or can have a significant environmental impact.

4.3.1 Environmental Aspects

Spartan has identified applicable environmental aspects and related impacts of its activities and products within the defined scope of the EMS that it can control and that it can influence taking into account planned or new developments, or new or modified activities and products in order to determine which can have a significant impact on the environment. Spartan utilizes a Significant Aspect Planning Summary Sheet (EHS-FR-0009) and Initial Environmental Review (EHS-FR-0024) to identify the environmental aspects of its activities, products, and services within the defined scope of the EMS.

Consistent with 4.5.3, the aspects/impacts assessment carried out pursuant to this section shall specifically include, but not be limited to, identifying activities, products, or services where equipment malfunctions and deterioration, operator errors or deliberate malfeasance are causing, or have the potential to cause: (1) unplanned or unauthorized releases of hazardous contaminants to the environment, (2) a threat to human health or the environment, or (3) noncompliance with legal requirements.

Related Documentation

EMS-FR-0001 Environmental Management Program Form

EMS-PD-0001 Environmental Management System - Aspects and Impacts

EMS-PD-0002 Environmental Management System - Legal and Other Requirements

EMS-PD-0005 Environmental Management System - Training

EHS-FR-0009 Significant Aspect Planning Summary Sheets

EHS-SR-0003 Environmental Aspects Rating Rationale

4.3.2 Legal and Other Requirements

Spartan is required to comply with a variety of legal and other requirements that are applicable to the environmental aspects of its activities, products or services. Spartan ensures these applicable legal and other requirements to which we subscribe are taken into account in establishing, implementing and maintaining the EMS.

Related Documentation

EMS-PD-0002 Environmental Management System - Legal and Other Requirements

EMS-SR-0020 Standard/Reference: Regulatory Requirements

REC-PD-0001 SBS Record Retention

REC-SR-0003 Record Retention Matrix

4.3.3 Objectives and Targets

Spartan has established and maintains documented environmental objectives and targets coherent with the environmental policy. Spartan ensures that objectives and targets are measurable where practicable and consistent with the environmental policy including the commitments 1) to prevention of pollution, 2) to compliance with applicable legal requirements and with other requirements to which the organization subscribes and 3) to continual improvement.

Related Documentation

EMS-PD-0003 Environmental Management System - Objectives and Targets and
Environmental Management Programs

EHS-FR-0009 Significant Aspect Planning Summary Sheet

EMS-FR-0001 Environmental Management Program Form

4.4 IMPLEMENTATION & OPERATION

4.4.1 Structure and Responsibility

Spartan has defined, documented and communicated the roles, responsibility and authority of personnel in order to facilitate an effective EMS. The organizational chart includes responsibility and authority information. Spartan ensures the availability of resources essential to establish, implement, maintain and improve the EMS. Resources include human resources and specialized skills, organizational infrastructure, technology and financial resources.

Related Documentation

EMS-PD-0004 Environmental Management System - Roles and Responsibilities

4.4.2 Training, Awareness and Competence

Spartan has identified training needs of all employees in relation to the EMS. Systems are maintained for identification, evaluation, recording and fulfillment of training needs. Personnel, including contract employees whose work may create a significant impact upon the environment receive the appropriate training.

Related Documentation

EMS-PD-0005 Environmental Management System - Training Procedure

HRT-PD-0006 Training Systems

HRT-FR-0001 Training Sign-In Sheet

4.4.3 Communication

With regard to its environmental aspects, compliance with legal requirements and EMS, Spartan has established and maintained procedures for:

- a) An ongoing means of internal communication regarding environmental issues and information among the various levels and functions of the organization, to

- include all organization personnel and those working on its behalf, and a means for receiving, documenting, and responding relevant communication from those individuals.
- b) Handling internal communications between the various levels and functions of the organization and external communications with interested parties.
 - c) As appropriate, implementing and maintaining security measures to prevent unauthorized disclosure of EMS information (including audits and reviews) and documentation, which shall include protocols for responding to inquiries and requests of information.

Related Documentation

EMS-PD-0006 Environmental Management System - Communications

4.4.4 Environmental Management System Documentation

Spartan has developed an EMS documentation system that is organized into a four-tiered structure. Each of these levels will provide direction to relative documents in other levels.

- Level 1 - EMS Manual
- Level 2 - EMS Processes
- Level 3 - Business Processes/Operational Instructions
- Level 4 - Forms/Records

This manual is the Level 1 EMS documentation that provides clear linkage to all elements of the EMS.

Related Documentation

EMS-0001 EMS Manual

4.4.5 Document Control

Spartan has established a document control system that controls all documents and data that relate to satisfying the elements of the ISO 14001 standard. Essential documentation affecting environmental issues is reviewed for adequacy and approved by authorized personnel before its release. Changes to documents are reviewed and approved by the same functions that performed the original review.

Related Documentation

EMS-PD-0007 Environmental Management System - Document Control

4.4.6 Operational Control

Spartan identifies and plans those operations that are associated with the identified significant environmental aspects consistent with our environmental policy, objectives and targets in order to ensure that they are carried out under appropriate conditions.

Preventative Maintenance will be used to monitor equipment and provide for scheduled maintenance activities. Well maintained equipment will help maximize energy conservation and minimize potential environmental impacts.

Related Documentation

FAC-PD-0001 Preventative Maintenance Process

EMS-PD-0008 Environmental Management System - Operational Control

QUA-OI-0001 through QUA-OI-0781 Operational Instructions

4.4.7 Emergency Preparedness and Response

Spartan has identified the potential for accidents and emergency situations that could result in environmental impacts. Spartan responds to actual emergency situations and accidents and prevents or mitigates associated adverse environmental impacts. Spartan shall periodically review and, where necessary,

revise its emergency preparedness and response procedures, in particular after the occurrence of accidents or emergency situation. Spartan shall also periodically test such procedures where practicable.

Related Documentation

EMS-PD-0009 Environmental Management System - Emergency Response

EHS-PD-0003 Injury Investigation Form Completion

HRT-FR-0001 Training Sign-in Sheet

HRT-PD-0006 Training Systems

DOC-PD-0004 Document and Data Control

4.4.8 Incentives

It is the responsibility of Spartan personnel to maintain environmental compliance, environmental stewardship and EMS conformance on a day-to-day basis. To that end, Spartan has implemented a War on Waste (WOW) recognition process where team problem solving techniques are utilized to identify waste streams and develop waste reduction or waste elimination solutions.

4.5 CHECKING AND CORRECTIVE ACTION

4.5.1 Monitoring and Measurement

Spartan has established and maintains a system for measuring and monitoring the key characteristics of our operations that can have a significant impact on the environment. This system includes recording information to track performance, relevant operational controls, and conformance with the established objectives and targets.

Related Documentation

EMS-PD-0011 Environmental Management System - Monitoring and Measuring

4.5.2 Evaluation of Legal and Other Requirements

Spartan has established a procedure to periodically evaluate how well our organization complies with legal environmental regulations and other requirements.

Related Documentation

EMS-PD-0002 Environmental Management System - Legal and Other Requirements

4.5.3 Non-Conformance and Corrective Action

Spartan has established and maintains a procedure for implementing corrective and preventive actions, which include procedures for the assessment, reporting, analysis and corrective actions of environmental related problems. To measure Spartan's compliance with the EMS, scheduled site inspections will be conducted. Upon inspection completion, all corrective actions will follow the Corrective and Preventive Action Procedure. During subsequent site inspections the previous audit's corrective and preventive actions will be verified.

Related Documentation

EMS-PD-0010 Environmental Management System - Corrective and Preventive Action

EHS-FR-0009 Significant Aspects Planning Summary Sheet

EHS-FR-0024

4.5.4 Records Management

Spartan has established procedures for identification, maintenance and disposition of all environmental records. These records are kept to demonstrate conformance to Spartan's EMS, the ISO 14001 standard and applicable regulations.

Related Documentation

EMS-PD-0012 Environmental Management System - Records

4.5.5 Environmental Management System Audits

Spartan has established and maintains procedures to carry out periodic audits of the environmental management system. The audit will determine whether the EMS conforms to planned arrangements for environmental management, including the requirements of the ISO 14001 standard and CFEMS and has been properly implemented and maintained.

A compliance audit will be conducted at least annually, by auditor(s) independent of the facility being audited. Evaluation results are reported to senior management and nonconformities (i.e., instances of noncompliance) are addressed through the process developed pursuant to element 4.5.3. Spartan's annual compliance audit work plan, including any schedule, shall be based on the legal requirements applicable to the evaluated facility, and results of previous audits. Spartan will conduct routine, objective, self-inspections by supervisors and trained staff.

Related Documentation

EMS-PD-0013 Environmental Management System - Audit

EMS-PD-0002 Environmental Management System - Legal and Other Requirements

EMS-PD-0004 Environmental Management System - Roles and Responsibilities

4.6 MANAGEMENT REVIEW

Spartan has established a process for top management to review the EMS. Top management will review the EMS at planned intervals to ensure continuing suitability, adequacy and effectiveness. Spartan will conduct a complete management review at least semi-annually.

Related Documentation

EMS-PD-0014 Environmental Management System - Management Review
MGT-PD-0001 SBS Management Review