

Environmental Management System



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Environmental Policy

I.D. Images LLC's commitment to environmental sustainability lies in our value of "Community Involvement". We understand that we are part of a global community that reaches far beyond the neighborhood in which we operate, therefore, we are dedicated to environmental improvements that foster a sustainable future and lead to social and economic improvements in the community we do business.

I.D. Images LLC is committed to managing health, safety and environmental (HS&E) matters as an integral part of our business. In particular, it is our policy to assure the HS&E integrity of our processes and facilities at all times and at all places. We will do so by adhering to the following principles:

Compliance: We will comply with all applicable laws and regulations and will implement programs and procedures to assure compliance. Strict compliance with HS&E standards will be a key ingredient in the training, performance reviews and incentives of all employees.

Where existing laws and regulations are not adequate to assure protection of human health, safety and the environment, we will establish and meet our own HS&E quality standards.

Prevention: We will employ management systems and procedures specifically designed to prevent activities and /or conditions that pose a threat to human health, safety or the environment.

We will minimize risk and protect our employees and the communities in which we operate by employing safe technologies and operating procedures, as well as being prepared for emergencies.

We will strive to prevent releases to the atmosphere, land or water. We will minimize the amount and toxicity of waste generated and will ensure the safe treatment and disposal of waste.

Communication: We will communicate our commitment to HS&E quality to our employees, vendors and customers. We will solicit their input in meeting our HS&E goals and in turn will offer assistance to meet their goals.

Continuous Improvement: We will continuously seek opportunities to improve our adherence to these principles, and will periodically report progress to our stakeholders.

Brian Gale – President

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Purpose

I.D. Images LLC has developed and implemented an Environmental Management System (EMS) in order to document the company's best environmental business practices, better satisfy the requirements and expectations and improve the overall management of the company.

The Environmental Management System of I.D. Images LLC meets the requirements of the TLMI L.I.F.E certification and addresses the environmental issues associated with I.D. Images LLC activities, operations, services and products. It is the responsibility of the Director of Product Development and Improvements; the designated Environmental Management Representative to ensure that this manual and the environmental management system is current with all requirements established by TLMI L.I.F.E.

The principal elements of the system described in this manual are:

- Environmental Policy
- Environmental Risks
- Legal and Other Requirements
- Environmental Objectives and Targets
- Environmental Management Programs
- Organizational Structure and Responsibility
- Training, Awareness and Competence
- Emergency Preparedness and Response
- Nonconformance and Corrective and Preventive Action
- Performance and Management Review
- Monitoring and Measurement

This manual is used internally to guide the company's employees through various requirements of the TLMI L.I.F.E. certification that must be met and maintained in order to ensure environmental stewardship, customer satisfaction, and continual improvement and provide the necessary instructions that create an empowered work force.

This manual is used externally to introduce our Environmental Management System to our customers and other external organizations or individuals.

Scope

- This EMS manual applies to all activities and personnel within the 2991 Interstate Parkway, Brunswick, OH 44212 location.
- The scope of the EMS provides a mechanism for environmental management throughout all areas and departments.

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- The EMS is designed to cover environmental risks which a facility can control and directly manage, and those it does not control or directly manage but can be expected to have an influence.

1.0 Environmental Policy

I.D. Images LLC's Environmental Policy is endorsed by I.D. Images LLC's President/Owner; Brian D. Gale

The policy covers all activities at the corporate facility; 2991 Interstate Parkway, Brunswick, OH and includes a commitment to continual improvement and prevention of pollution, as well as a commitment to meet or exceed relevant environmental legislation, regulations and other requirements. The environmental management system will be reviewed annually by top management, communicated to all employees and made available to the public in accordance with the environmental communication procedure.

Reference Material

TLMI L.I.F.E. Scorecard (4.1.1)

Applicable Procedures

EP-001 Environmental Communication

2.0 Environmental Risks

I.D. Images LLC's Cross Functional Team (CFT) identifies the environmental risks, which the facility controls and over which it may be expected to have an influence.

These risks are reviewed annually by the CFT or when there is a new or changed process or activity at the facility. The Environmental Management Representative or designee maintains CFT minutes and other records.

Reference Material

TLMI L.I.F.E. Scorecard (4.1.2)

Applicable Procedures

EP-002 Environmental Risks, Objectives and Targets

EP-004 Environmental Review of Projects

3.0 Legal and Other Requirements

I.D. Images LLC has established an environmental procedure for the purpose of identifying, accessing and communicating legal and other requirements that are applicable to the facility. Local regulations are identified, accessed and communicated by the Environmental Management Representative, or designee, through review of the most current state and local requirements as applicable to I.D. Images LLC.

Reference Materials
TLMI L.I.F.E. Scorecard (1.5.1)

Applicable Procedures
EP-003 Environmental Regulations and Other Requirements

4.0 Environmental Objectives and Targets

The Cross Functional Team has developed objectives and targets for each environmental risk. These objectives and targets define:

1. The performance objectives (sustain, improve or investigate) for each significant environmental risk.
2. The action plan for documented objectives
3. The specific, quantified targets which define those performance objectives

Objectives and targets are developed by considering environmental risks, technological options, financial, operational and business plans and the views of interested parties.

Reference Material
TLMI L.I.F.E. Scorecard (4.1.3)

Applicable Procedures
EP-002 Environmental Risks, Objectives and Targets
EP-004 Environmental Review of Projects

5.0 Environmental Management Programs

The Cross Functional Team establishes environmental management programs (EMPs) as a means for achieving objectives and targets. These programs define the principal actions to be taken, those responsible for undertaking those actions and the scheduled times for their implementation. The EMPs are developed by the Cross Functional Team and approved by the Managing Director (refer to Section 1.0 Environmental Risks, Objectives and Targets).

Reference Material:
TLMI L.I.F.E. Scorecard (4.1.4)

Applicable Procedures
EP-002 Environmental Risks, Objectives and Targets
EP-004 Environmental Review of Projects

6.0 Organizational Structure and Responsibility

Environmental management system roles, responsibilities and authorities are defined at relevant functions and levels within the organization. I.D. Images LLC's Management Team jointly provides the resources essential to the implementation and control of the environmental management system, including: training, human resources, specialty services, financial resources, technical and informational services.

The Environmental Management Representative has primary responsibility for establishing, operating and maintaining the EMS. A Cross Functional Team provides routine EMS support and reports directly to the Environmental Management Representative.

Reference Material:
Organizational Chart (Core)

7.0 Training, Awareness and Competence

I.D. Images LLC identifies, plans, monitors and records training needs for personnel whose work may create a significant impact upon the environment. I.D. Images LLC has established an environmental procedure to train employees at each relevant function and level so they are aware of the environmental policy, significant environmental risks, their roles and responsibilities in achieving conformance with the policy and procedures, and with the requirements of the environmental management system. Human Resources is responsible for maintaining employee-training records.

Reference Material
TLMI L.I.F.E. Scorecard (4.1.5)

Applicable Procedures
EP-005 Environmental Training and Awareness

8.0 Emergency Preparedness and Response

I.D. Images LLC has established an environmental procedure to identify potential for and respond to accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. Emergency methods and training is managed by Human Resources on an annual basis and after the occurrence of accidents or emergency situations.

Reference Material
L.I.F.E. Scorecard (4.1.6)

Applicable Procedures
EP-006 Emergency Preparedness and Response

9.0 Nonconformance and Corrective and Preventive Action

I.D. Images LLC has established ISO 9001 procedure for defining responsibility and authority for handling and investigating non-conformances, for taking action to mitigate impacts, and for initiating and completing corrective and preventive action. Any changes in procedures resulting from corrective and preventive actions are implemented and recorded.

Reference Material

TLMI L.I.F.E. Scorecard (4.1.7)

I.D. Images LLC Quality Management System

Applicable Procedures

EP-007 Non-Conformance and Corrective and Preventive Action

10.0 Performance and Management Review

Periodic performance reviews are conducted to ensure that the environmental management system has been properly implemented and maintained. The results of these review are provided to I.D. Images LLC senior management team. Reviews are performed annually according to a schedule, which is based on the environmental importance of an activity, the results of previous reviews and the review schedule.

Reference Material

TLMI L.I.F.E Scorecard (4.1.8)

Applicable Procedures

EP-008 EMS Performance and Management Review

11.0 Monitoring and Measurement

I.D. Images LLC has established ISO 9001 procedures that define the process for controlling the maintenance process and the requirements and responsibilities for identification, calibration and maintenance of monitoring and measuring equipment.

Reference Material

TLMI L.I.F.E. Scorecard (4.1.9)

I.D. Images Quality Management System

Applicable Procedures

ISO 9001: Equipment Maintenance Procedure (Core)

ISO 9001: Monitoring and Measuring Equipment Procedure (Core)