

Integrated Environmental Management System (IEMS) Manual

Lincoln Training Center (LTC)

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Revision 1.0

Purpose of This Manual

The purpose of this manual is to serve as a high-level “road map” to LTC’s IEMS and to house the procedures which LTC follows in implementing and maintaining its IEMS.

This manual, and subsequent revisions, is distributed by the IEMS coordinator to senior management (including the IEMS management representative), and the IEMS committee. It is made available to all LTC employees and on request, to the public, customers, and authorities.

This manual also serves as the basis for LTC’s internal assessment of its IEMS.

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Mission Statement

The mission of Lincoln Training Center is to foster independence and improved quality of life for individuals with disadvantages or developmental disabilities, through the maximum effort of the organization's staff, membership and volunteers. This will be accomplished through the unqualified commitment to-and delivery of-diverse, high quality programs and services to Lincoln Training Center's clients, customers, and the community throughout California.

LTC's IEMS: Introduction

LTC has developed, and is maintaining, an IEMS in order to ensure that we continue to supply a high quality product to our customers while providing a safe, healthy workplace for our employees and acting as a responsible member of our community. LTC's IEMS is designed to help us understand our environmental impacts and, through proactive management, reduce the risks that our productive operations pose to our employees and to the environment. The IEMS is also the means through which we follow through on the commitments expressed in our environmental policy.

Lincoln Training Center is aware of its responsibilities as an employer, as a consumer of cleaning products and as a provider of custodial and minor manufacturing services. We are concerned with both long-term and short-term effects of our services in relation to the environment. This applies to the chemicals contained in the cleaning products we use, the way we handle waste disposal, and the activities of our staff at work.

With this in mind Lincoln Training Center maintains an environmental plan to promote a practical day-to-day commitment to the environment and to be recognized as an environmentally responsible company in the community.

Purpose

To establish policies and procedures for the selection, purchase, and practices surrounding the use of chemicals and equipment in accordance with all local, state, and federal laws and regulations and specified customer contract requirements.

Scope

This document applies to LTC's custodial, grounds maintenance, and production customers and subcontractors.

IEMS Responsibilities

LTC has established an IEMS management representative, coordinator, and committee with the following responsibilities:

- *Management representative.* The IEMS management representative is the member of LTC's top management group responsible for the functioning of the IEMS. It is his or her job to ensure that all tasks relating to the IEMS are identified and completed in a timely manner. He or she is also responsible for reporting periodically to the top management group on the progress and results of the IEMS.
- *Coordinator.* The IEMS coordinator's responsibility is to identify, assign, schedule, provide the necessary support for, and ensure completion of all tasks relating to the IEMS. The coordinator works closely with the management representative and with the committee. The IEMS coordinator is also responsible for maintaining this manual, under the leadership of the management representative.
- *Committee.* The IEMS committee (which also serves as the facility's safety committee) is comprised of supervisors and employees from major groups or areas within the organization. The committee is responsible for ensuring that IEMS activities in their areas are carried out and for reporting the results of these activities to the committee as a whole. In addition, the committee itself undertakes certain IEMS activities such as the selection of significant environmental aspects. The committee meets quarterly to discuss the IEMS.

IEMS Committee

The following table lists the LTC's IEMS management representative, coordinator, and committee:

IEMS Function	Name	Regular Position
Management Representative	Casey Richards	Director, Community Services
IEMS Coordinator	Lucille Aguilar	Purchasing Agent
IEMS Committee	Gary Griffen	Exec. VP
	Amy Camp	Program Director-North
	Eddie Camp	Program Director-South

Environmental Policy

The core of LTC's IEMS is our environmental policy. The environmental policy states in broad terms the principal environmental commitments of LTC. It is signed by our President and has been communicated to all employees. The environmental policy is provided to each of our employees and is available, on request, to the public, customers, and authorities. The IEMS coordinator is responsible for ensuring that only the most recent version of the environmental policy is posted and available.

The environmental policy of LTC is reproduced below:

LTC is committed to meeting or exceeding relevant environmental regulations and other environmental related requirements through the continual improvement of its environmental management system and the prevention of pollution. LTC will develop and monitor annual environmental objectives, and targets, to assist in meeting the commitment.

Additionally, Lincoln Training Center's policy is to manage cleaning methods and chemicals in a responsible manner that minimizes potential environmental and health impacts and fully considers legal requirements and governmental policies. Lincoln Training Center also takes customer expectations & concerns, short and long-term benefits, costs & liabilities, and viable material and process alternatives into consideration.

Green Cleaning Policy

Lincoln Training Center's policy is to utilize the best, most effective and efficient, safest and most green and economical equipment and chemicals available on the market today. We will review and replace standard chemicals with green chemicals using a product performance evaluation process where possible, with a goal of fifty (50) percent implementation by end of FY 2013.

We have a commitment to:

- The reduction of waste and consumption of materials, water, and energy.
- Minimizing the environmental effect of new developments and activities through strategic planning.
- Purchase products that minimize environmental effects in production, use and disposal.
- Reduce or eliminate the production and release of pollution into the environment.

Objectives:

Comply fully with all local, state, and federal laws and regulations.

Encourage full participation and commitment from all employees by carrying out appropriate training and record keeping.

Ensure that we will comply with current standards that incorporate best industry practices that are sustainable.

Guidance:

For the purpose of compliance, we will use as guidance:

[ISSA's CIMS and CIMS-GB requirements](#)

[Green Seal's GS-42 environmental standard](#)

Definitions

The Environment: Janitorially speaking, the environment is primarily the quality of the indoor air that we breathe, the chemicals and materials we expose ourselves and our

customers to, and the post consumption effects of chemicals and materials on landfills, and waste treatment plants.

Green Cleaning: The use of cleaning products, equipment, and practices that have a lower environmental impact than conventional products and practices.

Environmentally Preferable: Defines it as products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose.

Environmental Practices

- Water Efficient Practices and Equipment:

We will immediately report water leaks in restrooms, janitor closets, kitchens, and outdoor areas.

We will use and maintain chemical mixture systems wherever possible.

We will wash our vehicles a maximum of one time per month or/only as needed.

- Energy Efficient Practices and Equipment

We will turn off computers and other devices at the end of the day, or if practical, whenever possible.

We will turn off lights in rooms after servicing whenever practical.

We will use energy efficient equipment, whenever practical.

- Vacuum cleaners:

When available, we will use vacuum cleaners that meet the Carpet and Rug Institute's (CRI) Green Level Vacuum Cleaner certification.

Vacuums must have a sound level of 70dBA or less.

We will use vacuum cleaners equipped with HEPA filters that capture 99.9% of indoor pollutants.

We will review the use back pack type vacuum cleaners as an alternative to other methods of cleaning such as dust mopping where applicable.

- Alternate Fuels

Alternative Transportation - Public Transportation Access

Encouraging Carpooling where possible.

We will assist our employee with disabilities with obtaining Public Transportation and encouraging ride sharing when possible.

We will pursue/prioritize contracts within a 30 mile radius to reduce fuel emissions.

Use of Environmentally Preferred Products

Green Chemicals

We will review and replace standard chemicals with green chemicals using a product performance evaluation process where possible.

Requestors of new chemicals and/or equipment will fill out the “New Chemical Purchase Application Form” (Appendix A) or the “New Equipment Purchase Application Form” (Appendix B) and submit to the authorized levels management. The form will be routed to the appropriate levels of authority for approval prior to placing any orders. The organization will determine the impact of chemical or equipment in accordance to the implementation plan in the Application forms.

We will maintain an approved chemical list and a record of chemicals that were tried, but not approved.

Standards

We reserve the right to use third party independent labs to qualify uncertified chemicals that come under scrutiny. When practical, we will seek to procure products that meet the following standards.

Green Seal

Environmental Choice/Eco Logo

US EPA’s Design for the Environment

Carpet and Rug Institute (CRI)

Non-Ozone Depleting Products

We will use non-ozone depleting products as defined by the EPA:

<http://www.epa.gov/ozone/science/ods/index.html>

Low/Non-Toxic and Non-Hazardous Materials

We will not use chemicals that are considered disposable as hazardous waste.

When possible, we will reduce or eliminate all products that use or contain:

- Aerosols or Compressed propellants
- Ammonia
- Chlorines or Bleaches
- Oil or Petroleum
- Odorants or Perfumes
- Dyes
- Volatile Organic Compounds (VOC)s
- Solvent and Butyl-based products
- A low NFPA Health Rating on a scale of 0 – 4, 0 is the most preferable.

Packaging

Use of concentrated chemicals will reduced packaging requirements.

Packaging will be recycled when practical.

Recycled Contents of Products

We will procure paper products that have a 30% or greater post-consumer recycled content.

Indoor Chemical Pollutant and Source Control

When possible, we will eliminate products or practices that produce airborne particles, or surface residues.

Recycling and Landfill Reduction

- Collection and Recycling Practices
- Waste paper recycling in all areas.

- Recycling all printer cartridges.
- Recycling all batteries.
- Properly manage trash vs. recycling in office and nearby areas.
- Reusing paper for message and note pads.
- Reusing envelopes and packaging.
- Send surveys and other correspondence electronically when possible.

Water Use and Waste Treatment Reduction

As we move forward, we will research and adapt to methods that use less water in our cleaning process.

Chemical Handling, Storage, and Disposal

Spill Containment Plan and Training

We will maintain a separate Spill Containment Plan.

Documented training shall occur.

We shall meet the following practices:

- Employees will be provided with training on the chemicals they will be utilizing.
- Chemicals shall be properly labeled.
- Chemicals deemed hazardous or require special handling and training will be controlled in locked cabinets when not in use. Cabinets will remain locked at all times when not in use.
- Chemicals will be stored by like kind (classification) and separated if their combination is deemed hazardous.
- Chemicals shall be used strictly in accordance with manufacturer's recommendations and intent.
- No unauthorized chemicals shall be utilized by our staff.
- MSDS sheets shall be readily available, accessible, and current to existing inventory.

Supplier and Customer Partnering

Lincoln Training Center believes that such actions can only be truly effective if carried out with the cooperation of our suppliers, subcontractors and our customers equally. Suppliers will be expected to advise us about new products and/or methods that will further environmental progress. Customers will be work with us concerning any new policies they put in place or

operational practices that affect our services.

Training

To ensure that our employees carry out their duties in an environmentally responsible manner, LTC provides all employees with environmental awareness training on LTC's policies and procedures and provides task-specific training to those employees whose jobs are associated with significant environmental aspects.

Awareness Training

As part of our new hire orientation, LTC's employees receive a copy of LTC's IEMS for a review of our environmental policies and objectives. This introduction, which includes an opportunity for the new employees to ask questions about the IEMS, is given by LTC's Personnel Coordinator and/or Department Manager as part of the general orientation for new employees. Records of employees who have received this introduction are maintained by the HR department.

Task-Specific Training

The IEMS committee, in conjunction with the relevant operations manager, then determines what training employees performing each of these job functions should receive in order to control actual environmental impacts to the greatest possible extent possible.

All aspects of this plan will be incorporated into our standard custodial staff training. This can be verified through the use of:

- Training Schedules
- Agendas
- Documented attendance

Continuous Improvement

Management Commitment

Lincoln Training Center's management will take responsibility to regularly review practices and policies that have a direct effect on the environment and review our IEMS plan, minimally, on an annual basis.

Quality Control Inspections

LTC's QC Managers are required to complete a Hazard Assessment & Correction Report when completing site visits. The goal of this report is to determine potential hazards and make immediate corrective action to provide a safe work environment for our employees.

Risk Assessments

LTC is in the process of reviewing/completing a risk assessment for each site served, with completion targeted by end of FY 2013. The purpose is to establish particular risks at job sites, keep employees well informed of risks, provide appropriate PPE (Personal Protective Equipment) and develop a plan of action to correct deficiencies.

CIMS GB-Certification

Lincoln Training Center is in the process of obtaining CIMS (Cleaning Industry Management Standard), in green building certification, with the goal of certification by end of FY 2013. This will assist Lincoln in maintaining best industry practices and ensure our organization uses environmentally preferable cleaning practices.

Reporting

Chemical and Equipment Inventory

LTC maintains a chemical and equipment inventory system for each contract served. Lincoln Training Center is in the process of reducing types of chemicals at each location, while finding chemicals that have a generalized capability – like those containing hydrogen peroxide.

LTC is in the process of expanding our inventory system, with the goal of maintaining record of the following by end of FY 2013:

- Show which chemicals are bio-based.
- Show health and pH ratings.
- Show increase in “green certified” chemicals.
- Plans for finding substitutes and phasing out current chemicals.
- Show which pieces of equipment meet certifying body requirements
- Show which pieces of equipment meet HEPA, noise, etc. requirements

Vehicles

For each vehicle, we will monitor gallons of gas used, mileage used per month, vehicle check-ups, oil changes, tire changes, and repairs.

Appendix A:

New Chemical Purchase Application Form

New Chemical Requested:	Source / Item No.:	Date:	
Name of Requestor:	Price:	Replacing Chemical (s):	
Site(s) Affected:			
Reason for New Product Purchase: (Check all that apply)			
<input type="checkbox"/> Cost	<input type="checkbox"/> Multi-Purpose - Eliminates more than one chemical.	<input type="checkbox"/> Dilution / Dispenser Change	
<input type="checkbox"/> More Effective Product	<input type="checkbox"/> Health Ratings Better	<input type="checkbox"/> _____	
<input type="checkbox"/> Special Application (specify)	<input type="checkbox"/> P/H Ratings Better	<input type="checkbox"/> _____	
<input type="checkbox"/> Old chemical no longer available	<input type="checkbox"/> Safer	<input type="checkbox"/> _____	
<input type="checkbox"/> Green certified	<input type="checkbox"/> Container Size Change	<input type="checkbox"/> _____	
<input type="checkbox"/> Specified by Customer	<input type="checkbox"/> Phasing out entire inventory	<input type="checkbox"/> _____	
<input type="checkbox"/> Specified by Mfg's Equipment			
Reason for New Purchase: (Please describe in detail)			
Implementation Plan: (add names and notes as appropriate)			
Product Tested by (Name(s) Here):	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
MSDS Analysis verified: Chemical is safer or at least the same as current chemical? I.e. less PPE required, better Health, and /or PH level.	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Pricing Verified/Negotiated by:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Customer)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Operations Manager)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Employees using product)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Phase in Plan:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
A) List Inventory of old chemicals?	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
B) Disposition of old chemicals? (i.e. Use at current site, dispose of, resell, etc.)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
C) What is the expected old chemical out of stock date?	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Order Placed – First Delivery Date:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
MSDS Books Updated (all sites):	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Storage procedures updated or established:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Spill Containment Plan updated or established:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Exposure Control Plan updated or established:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
PPE Analysis: Any new PPE requirements / Purchased	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Training Planned:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Training Completed:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Dispensers Purchased:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Dispensers Installed:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>

Appendix B

New Equipment Purchase Application Form

New Chemical Requested:	Source / Item No.:	Date:
Name of Requestor:	Price:	Replacing Equipment(s):
Site(s) Affected:		

Reason for New Product Purchase: (Check all that apply)		
<input type="checkbox"/> Cheaper	<input type="checkbox"/> Safer	<input type="checkbox"/> _____
<input type="checkbox"/> More Effective Product	<input type="checkbox"/> Other (Specify)	<input type="checkbox"/> _____
<input type="checkbox"/> Special Application (specify)	<input type="checkbox"/> Phasing out equipment	<input type="checkbox"/> _____
<input type="checkbox"/> Old equipment no longer available		<input type="checkbox"/> _____
<input type="checkbox"/> Specified by Customer		<input type="checkbox"/> _____
<input type="checkbox"/> Specified by Mfg'r's Equipment		<input type="checkbox"/> _____
<input type="checkbox"/> Changing Source		<input type="checkbox"/> _____

Reason for New Purchase: (Please describe in detail)

Implementation Plan: (add names and notes as appropriate)			
Product Tested by (Name(s) Here):	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Pricing Verified/Negotiated by:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Customer)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Program Manager)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Purchase Approved by: (Employee using equipment)	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Order Placed – First Delivery Date:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
S.T.A.R.S. or other use procedures updated or established:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Training Planned:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Training Completed:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Maintenance schedule established:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>
Item inventoried, asset tagged, entered into database:	Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	N/A: <input type="checkbox"/>