



Braswell Services
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ENVIRONMENTAL MANUAL
for
ISO 14001:2015

Revision History Table

Rev	Date	Description	Reviewed By	Approved By
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2.0 Table of Contents

1 Revision History Table 2

2 Table of Contents 3

3 Terms & Definitions 5

4 Context of the organization 6

4.1 Understanding the organization and its context 6

4.2 Understanding the needs and expectations of interested parties 6

4.3 Determining the scope of the Occupational Health & Safety management system 6

4.4 EMS 6

5 Leadership 7

5.1 Leadership and commitment 7

5.2 EMS Policy 7

5.3 Organizational roles, responsibilities 7

5.4 Consultation & Participation of Workers 7

6 Planning 8

6.1 Actions to address risks and opportunities 8

6.1.1 General

6.1.2 Hazard identification & assessment of risks and Opportunities

6.1.3 Determination of legal requirements and other requirements

6.1.4 Planning action

6.2 EMS objectives and planning to achieve them 8

6.2.1 EMS objectives

6.2.2 Planning to achieve EMS objectives 8

7 Support 8

7.1 Resources 8

7.2 Competence 9

7.3 Awareness 9

7.4 Communication 9

7.4.1 General

7.4.2 Internal communication

7.4.3 External communication

7.5 Documented information 9

7.5.1 General

7.5.2 Creating and updating

7.5.3 Control of documented information

8 Operation 9

8.1 Operational planning and control 10

8.2 Emergency preparedness & Response 10

9 Performance evaluation 12

9.1 Monitoring, measurement, analysis, and evaluation 12

9.2 Internal audit 12

9.3 Management review 12

10 Improvement 12

10.1 General 12

10.2 Incident, nonconformity, and corrective action 12

10.3 Continual Improvement 12



Appendices

EMS Quality Policy..... Appendix A

Target Attainment Plan Appendix B

Organizational ChartAppendix C

Roles & Responsibilities Appendix D

Process Interaction & Flow MapAppendix E

Procedural MatrixAppendix F

Interested Parties..... Appendix G



3.0 Scope and Company Information

“Aerospace and Military Logistics and Manufacturing Services”

Braswell Services is a HUBZone certified company that has developed a Quality Management System to better satisfy the needs of its customers and to continually improve the overall management and success of the company. This system conforms to the requirements defined in the international standard ISO9001:2015, AS9100:2016 (D), AS9120:2016 (B) and ISO 14001:2015.

4.0 Context of the organization

- 4.1 Management reviews all potential issues, both internal and external, potentially impacting the products and services provided and the environment and takes appropriate actions to align any issues discovered with business strategy and scope. Such planning includes establishing this management system structure and all associated processes, procedures, instructions and forms, as well as providing necessary resources to meet desired business outputs for relevant Interested Parties. Information relating to our organization is discussed and appropriate actions identified, recorded, and taken during Management Review Meetings.
- 4.2 Interested parties can include management, employees, customers, suppliers, regulatory and accreditation agencies, and ultimately the end users of products and services provided. Needs and expectations of interested parties are defined during each associated process (quoting, sales, purchasing, etc.) and actions are taken to ensure this communication is clear and fully understood by all pertinent parties. Information relating to interested parties and any feedback received is reviewed and acted upon (as necessary) during Management Review Meetings.
- 4.3 The overall scope, capabilities, and expertise performed and provided is defined in section 3 above. This scope includes all requirements per applicable standards, regulations, and customers (as appropriate) and is reviewed periodically by management to determine continued suitability and accuracy. Updates and changes will be defined and implemented as necessary to meet business scope and direction.
- 4.4 We have established, implemented, maintain and continually improve the management system, which includes the processes needed and their interactions in compliance with the ISO 14001:2015 standard. The main processes, activities within those processes, sequences, interactions, inputs, outputs, records, resources, and measures of success have been defined in **Appendix E**.

5.0 Leadership

- 5.1 The Management Team is committed to an effective EMS and demonstrates this commitment through:
- Leadership taking overall responsibility and accountability for the prevention of work-related injury and ill health, as well as providing an environmentally safe, and healthy workplace.
 - Ensuring the EMS policy and related EMS objectives are established and part of the strategic direction of the organization.
 - Ensuring the EMS requirements are integrated into the established business processes.
 - Ensuring the resources needed to implement, maintain, and improve the EMS are available.
 - Leadership will communicate the importance of the effectiveness of a healthy EMS and conforming to the EMS requirements and achieves the intended outcome(s).
 - Providing direction and support of persons contributing to the effectiveness of the EMS to ensure continuous improvement.
 - Hosting periodic Management Review Meetings to evaluate overall business effectiveness and promote improvement and growth



- h) Creating a culture within the organization that promotes and supports the intended outcomes of the EMS. Where workers are protected from reprisals when reporting incidents, hazards, risks and opportunities.
 - i) Leadership will encourage, establish, and implement processes for consultation and participation of workers in the establishing and improvement of the EMS.
 - j) Establishing and supporting functioning occupational safety and health groups and committees to provide input in the continual improvement and success of the EMS.
- 5.2 The company's EMS Policy and Objectives has been established and approved by the Top Management of the organization and is in **Appendix A**. This policy is communicated to all personnel via postings and initial training and is available to all interested parties upon request.
- 5.3 Lines of communication and authority are defined in the Organizational Chart located in **Appendix C** of this manual. This document is used to communicate key roles and levels of responsibility, as well as designating the Management Representative (MR).
- a) The Management Representative is the focal point for the Management System but is NOT the only personnel involved or responsible for the overall implementation, management, and performance. This responsibility is shared by all process owners and top management as a team.
 - b) The MR has a direct line to top management.
 - c) Top Management is responsible for ensuring the integrity of the EMS when changes occur, both planned and unplanned. This should be accomplished by planning such changes and putting "safety nets," or running "dual systems" while in a transition period to avoid potential process and product failures that could impact customer satisfaction.

Planning

- 6.1 The overall EMS management system is planned based on the EMS scope, direction and strategies discussed in sections 3 and 4 of the manuals and directed by top management and company leaders.
- a. Risks and opportunities for the overall EMS are initially evaluated by management at the top process level, which is reviewed regularly with actions taken to mitigate significant risks as necessary. Such risk identification and mitigation are defined within company procedure **QF-05, Risk Management**.
 - b. Each contract and/or purchase order is also associated with identifying and mitigating risks according to company procedure **SOP-06, Order Review and Acceptance**.
 - c. Management Review Meetings are held per **SOP-04, Management Review**, and include assessing current risk ratings, any changes or additions of those defined risks or impacts, and assigning actions as needed for mitigation efforts.
- 6.2 During the planning process management determines and assess the health and safety hazards and risks and opportunities relevant to the intended outcomes of the EMS. An assessment is performed prior to implementing any significant changes in the system.
- 6.3 Environmental Aspects and Hazard identification is an ongoing and proactive part of the EMS, which considers how work is organized, social factors, leadership and the culture required to ensure the success of the EMS. This process is outlined in more detail in **SOP-15, Environmental Aspects & Risk Hazard Assessment**.
- 6.4 Assessment measures have been established for each Core Process defined in our Process Interaction and Flow Map, **Appendix C**. These goals are consistent with all policies, are measurable against a desired level, and are communicated to all personnel via postings, emails, and briefings.



- 6.5 Change is an expected part of business, and our management team is looking for new and better methods of operation. When changes are determined appropriate, or required, they are implemented taking into consideration the allocation or reallocation of responsibilities, authorities and resources, environmental and safety risks including potential consequences while also ensuring the integrity of the overall EMS management system. These are assessed prior to any major or significant changes that might me a potential health or safety risk and at least annually during the management review meeting.
- 6.6 A member of the management team has been appointed the overall point of contact for the Management System, which is identified in the Roles and Responsibilities, **Appendix D**.

7.0 Support

- 7.1 Top Management ensures appropriate resources are provided and established, implemented, and maintained. This is all to ensure continual improvement of the EMS.
- Resources are monitored constantly by the management team and formally during the Management Review process.
 - Resources provided by external providers are determined during project planning according to company procedure **SOP-15, Environmental Aspects & Risk Assessment**.
 - Resources provided by external providers that do not affect product quality such as janitorial, facilities and certain administrative functions are determined and controlled by appropriate management.
 - Personnel and the overall work areas are crucial to maintaining a knowledgeable and sustainable business while providing quality products to our customers. For this reason, processes are in place to ensure effective and proper facilities and work environments are provided and maintained, and are monitored daily during operations, internal audits, and management reviews.
 - Personnel are trained to perform specific tasks according to company procedure **SOP-02, Competency and Training**. Additional training is provided when changes occur, or a trend is present that would warrant the need for such activity.
 - Training, established procedures, instructions and forms are in place to capture process knowledge and standardize activities that have proven to be effective. These documents and training processes are in place to carry down Organization Knowledge and longevity of business strategies.
- 7.2 Personnel competence is key in successfully performing tasks in a safe manner and yielding quality products/services to other departments within the business and ultimately the customer.
- Management has determined all necessary training, education, skills, and qualifications required to perform specific tasks. Competency can only be validated via comprehension and task demonstration as defined in company procedure **SOP-02, Competency and Training**.
 - Records of all trainings provided, qualifications, and certifications are maintained in employee training files.
- 7.3 All personnel are made aware of the established EMS policy, objectives, and goals. Their contribution to the effectiveness of the EMS management system, including the benefits of improving EMS performance. The implications and potential consequences of not conforming to the management system requirements; incidents and the outcomes of investigations relevant to their department, and how their role can impact the environment as well as quality of products/services provided.
- 7.4 Communication occurs via postings, briefings, formal meetings, and emails. The company website may also be used to communicate to both internal and external parties regarding matters determined appropriate by company management. Communication will consider compliance obligations, requests for information relating to these and the information generated is reliable and consistent with respect to the EMS. Documented information will be kept as appropriate.



- a. Feedback from internal personnel occur via email and safety meetings while external feedback can be calls, letters, emails or meetings as needed.
- b. Feedback from all sources is discussed during the Management Review process and can be acted upon immediately as determined appropriate by management and the nature of the feedback.
- c. Applicable regulatory and legal agencies will be contacted because of certain feedback, as determined necessary and appropriate by management.

7.5 Manuals, procedures, instructions, forms, and records are in place, maintained, and available to personnel to decrease possibility of error, promote standard quality practices, and provide objective evidence of completion.

- a. Company procedure **SOP-01, Control of Documented Information**, defines controls related to establishing, releasing, revising, and controlling internal and external documentation. **SOP-01** also defines controls related to retaining and protecting records dictated by internal policies and external requirements.
- b. All electronic data is periodically backed-up to prevent data loss.

8.0 Operation

8.1 The EMS organizational plan implements, controls, and maintains processes needed in developing and improving the EMS, and to implement actions that identify and prevent environmental risk. In the event of changes in processes and/or equipment that may have a direct impact on this the plan will be reviewed, and a risk analysis will be done prior to implementing the change.

- a. External providers, referred to as contractors and/or outside processing suppliers (outsourcing) are monitored and controlled to ensure conformity to the EMS requirements that pertain to the products or services provided. This includes any workers or personnel on-site performing work within the responsibility of the EMS.

8.2 The emergency preparedness and response plan are a key component of the EMS to be prepared for and respond to potential emergency situations. The plan includes the following;

- a. A provision for first aid material
- b. Providing training for the planned responses to the identified situations;
- c. Periodically testing and exercising the planned response capability and evaluating the performance
- d. Communicating with all relevant personnel, internal, visitor, contractual and first responders.

9.0 Performance evaluation

The EH&S Management System are monitored, measured, analyzed and evaluated periodically to ensure system success and to identify areas for improvement.

9.1 Key Process Indicators (also known as KPI's) are defined for each process as a Target Attainment Plan (TAP), which is specifically related to the management system. These process measures are formally evaluated and acted upon during the management review process per company procedure **SOP-04, Management Review**.

9.2 Internal Audits are periodically performed to ensure continued suitability of the management system, effectiveness and conformance to applicable standards, internal policies and procedures, and applicable external parties' requirements. Audits are performed in accordance with company procedure **SOP-03, Internal Audits**.



- 9.3 Formal Management Review Meetings (MRMs) are held at least annually to ensure that the Management System is functioning as planned and driving continual improvement per company procedure **SOP-04, Management Review**. Minutes of each meeting are documented on a standard form and actions are assigned as necessary.

10.0 Improvement

Continual Improvements are initiated through management review actions, internal audit actions, health, and safety assessments (JHA) process measures and trends, and formal Corrective Action Requests (CARs).

- a. Management is always looking at areas of improvement to processes, facilities, products provided, and quality in an effort in correcting, preventing, or reducing undesired effects with the intent of improving performance and effectiveness of the management system. When opportunity is determined appropriate and logical, action is directed, and resources provided with a clear description of desired output.
- b. Formal Corrective Action is required for any audit nonconformance (internal or external), when desired performance levels are not achieved during a reporting period (as determined appropriate and justified by management), and for systemic issues that require correction and prevention. Company procedure **SOP-10, Corrective Action**, defines responsibilities and actions for the corrective action process.
- c. Records of corrective actions and management reviews are maintained per company procedure **SOP-01, Control of Documented Information**.