

## Environmental Management System Description Frito-Lay, Inc., Beloit, Wisconsin

1. **Policy:** Previously submitted. Please let us know if additional information is needed.

2. **Aspects and Impacts:** Frito-Lay assesses Aspects and Impacts and sets Objectives and Targets annually and reviews with the Leadership Team (Upper Management). Objectives and Targets are reviewed and updated quarterly. Aspects are assessed for the entire facility, including ancillary operations. They are then evaluated as follows: whether the aspect is regulated, likelihood to occur, community concern and environmental impact. Each of these 4 qualifications is ranked and the resulting score determines significance. The facility then sets objectives and targets for significant aspects, as appropriate.

3. **Compliance:** The Beloit plant maintains a robust environmental program. Identification of regulatory matters is discussed in the next question; however, here is how Beloit maintains compliance with requirements.

- Instituted an electronic calendar system that includes all regulatory and EMS requirements. The Environmental Coordinator manages this calendar daily and follows-up with responsible individuals to ensure completion.
- Operational controls are maintained, operated and monitored to ensure compliance requirements are achieved. This will be discussed later; however, operators are trained to ensure that operational controls required for compliance are in good working order. Any breakdowns/malfunctions are repaired in a timely manner to ensure compliance is maintained.
- A Green Team (lead by the Environmental Coordinator) has been established. This team is a group of individuals from all shifts, and all functions that assists the Environmental Coordinator with the implementation of the environmental program. Unit leaders and Green Team members assist the EC in implementing EMS and compliance requirements. The Beloit Green Team is made up of 25 individuals. The EMS establishes clear roles and responsibilities for the EC, unit leaders, the Green Team members, and site leadership.
- On an annual basis, the plant participates in a compliance and EMS audit. This audit assesses the whole program and identifies any deficiencies. The plant also participates in mock audit coaching visits from the HQ environmental manager, where compliance matters are thoroughly evaluated.
- Non-conformance forms are utilized when non-conformances (considered break downs in the facility's environmental management system) are identified outside the Environmental audit process. The Environmental Coordinator will notify the affected department and corrective actions will be put in place and documented.

4. **Environmental Requirements:** The following is a list of ways that the Beloit plant ensures that environmental requirements are identified:

- The EMS details that the Corporate environmental managers will identify and monitor Federal regulatory requirements and notify the plant of any changes. This occurs on a regular basis through email or phone communication, through the distribution of formal

EMS guidance documents and at the annual Frito Lay Environmental Sustainability Summit.

- The EC subscribes to several regulatory publications including Environmental Compliance Alert, Air Matters, and the Federation of Environmental Technologists. Also, the EC attends the City bi-monthly wastewater meetings and receives updates from applicable consultants. On a monthly basis the EC distributes this information to Unit leaders, management and Corporate managers as appropriate.

**5. Objectives and Targets:** Objects and Targets are established annually and reviewed quarterly. They are reviewed with upper management annually. Objectives and Targets are set for significant aspects, and for other aspects the plant deems as significant (even though the analysis may not have shown them to be). Actions are set to meet the objectives and targets and progress is measured on a quarterly basis.

**6. Operational Controls:** Procedures are in place to ensure that every piece of control equipment is operated and maintained according to the Operations and Maintenance Manual. Preventative Maintenance and corrective actions are completed in a timely manner according to established procedures to ensure optimal operation. The EMS describes how employees must be familiar with the O&M manuals in their area and must receive proper training as part of their on-boarding to ensure they have the competence to complete the task. The facility also has an electronic preventative maintenance system that generates work orders according to the operational control manual. This program also generates emergency work orders if breakdowns/malfunctions occur. The advantage of the electronic system is that it generates notifications if items are not addressed in the required timeline.

**7. Training:** Frito-Lay has a robust training program described in the EMS to ensure employees are aware and know their responsibilities. Training activities include:

- Annual General Awareness for the entire plant which covers the requirements of the EMS, the importance of conforming with the Environmental Policy, the Green Team structure, explains what is the incident reporting protocol, covers the waste minimization program, reviews the Aspects, objectives and targets and reviews the pollution prevention/sustainability program implemented at the site.
- Annual Focused training for specific employee groups that could potentially have a greater impact on the environment (spill responders, maintenance, lab technicians, etc)
- Regulatory training at required intervals (DOT, Opacity, Backflow preventer, Refrigerant certification)
- Regular training for the EC through the annual Frito Lay Environmental Sustainability Summit and quarterly webcasts.

**8. Corrective Action and Emergency Response:** The EMS has several checks embedded into every day operation. For example, there are daily, weekly, monthly, quarterly, semi-annual and annual inspections, monitoring, recordkeeping and communication requirements. This ensures that potential items are identified and addressed before becoming a substantial issue. If a deficiency is identified, corrective actions must be established and completed in a timely manner. A system for identifying

non-conformances has been established and each facility participates in the annual environmental audit (and sets action plans against findings). The facility also maintains response plans such as SPCC and SWPPP, in addition to internal and regulatory Incident Reporting Protocols. Should an environmental emergency occur, these protocols would be used to ensure the appropriate response is taken. Several emergency response procedures are also embedded in our safety program. Teams are trained on these procedures annually.

**9. Communication Plan:** The EMS requires the plant to work with regulatory agencies prior to project implementation to ensure that environmental requirements are met according to regulatory timelines. Permits and permit applications also go through the public comment process before approval. Several project managers also attend City and wastewater meetings and discuss improvements scheduled to occur at the plant. All projects also go through an environmental review process prior to implementation. This is to ensure that the environmental coordinator is aware of the project and has the opportunity to provide feedback on environmental requirements or controls.

Employee communication uses various methods to communicate projects and activities, such as:

- Notice boards
- General Awareness training of facility personnel
- Environmental training of relevant job functions, practices and procedures as appropriate
- Newsletters
- Electronic notes, e-mails
- Team meetings and meeting minutes
- Environmental Action Plans

The EMS also describes a formal procedure which addresses environmental community concerns. Facility individuals involved with addressing these concerns are trained annually on specific response procedures. Environmental concerns received by phone calls, letters and visitors to the facility are directed to the Environmental Coordinator. A hierarchy of individuals exists if the Environmental Coordinator is unavailable for responding to the concern. Environmental community concerns are typically managed as follows: The Environmental Coordinator collects the necessary data regarding the concern. The concern and associated data are discussed with facility management and Frito-Lay Headquarters' Environmental Staff, and the necessary response action (i.e. phone call, letter, etc) is developed and executed to address the concern.

**10. Document Control:** Corporate documents are issued through the corporate environmental manager as required to ensure that the plant has access to the most up-to-date version. Revision dates, revision logs, and EMS numbers are placed on all corporate documents. At the plant level, the EC is the individual responsible for maintaining documents (as defined in the EMS). A corporate filing structure is implemented at the facility to ensure that regulatory and EMS documents are kept for the required time. Typically documents are kept for 5 years (or longer if specified in permits).

11. **Audits:** The EMS requires that the facility participate in an EMS and compliance audit annually. An external audit firm is hired to come on site and perform a 3 – 5 day audit of the facility. Upon conclusion on the audit, the facility receives a score and rating, and an summary of findings. The facility then must produce a follow-up action plan to address any deficiencies in a timely manner. The action plan is updated to reflect completion of activities.

12. **Continual Improvement:** As mentioned above, the facility continually works toward completing the action plan from the previous year's audit. The EC conducts monthly Green Team meetings to assess the health of each unit leader's programs. Upper management also meets on a weekly basis to discuss events at the plant, including environmental requirements, and annually reviews progresses against objectives and targets. The EC also sends out monthly updates to HQ to apprise them of issues at the plant.