

LYMI INC. dba REFORMATION (“REFORMATION”)

Environmental Management Plan

Reformation

2263 E. Vernon Ave
Vernon, CA 90058

Environmental Policy

A set of policies has been established guiding the execution of all work performed by Reformation. The policy that underpins the environmental activities is included in the following statement.

- Reformation is a factory where the protection of the environment is given high priority.
- Reformation recognizes that it has a responsibility to ensure that through the implementation of good environmental management practices all the potential adverse impacts on the environment associated with this project could be appropriately mitigated
- All works are conducted in compliance with all applicable environmental laws and regulations as well as the standards which support the protection, preservation and enhancement of the environment
- Perform top management reviews, at least annually, to ensure compliance with established policies, procedures and applicable environmental laws and regulation
- Maintain a commitment to waste minimization and pollution prevention and will incorporate these principles when defining project specification and conducting its activities
- Identify, assess and manage environmental risks and endeavor to set and review quantifiable objectives and targets associated with its operation to minimize the likelihood of adverse environmental impacts.
- Be committed to building relationships with government, the scientific community and the public to promote the development and communication of innovative, cost effective solutions to environmental problems
- Ensure a commitment to continual improvement of the Environmental Management System (EMS) wherever possible and sustainable

Potential Environmental Risk Assessment

A risk assessment has been accomplished for Reformation in the risk matrix for each potential hazard. The strategy of examining the “consequence” prior to the “likelihood” is conducted to ensure the implications are not overlooked purely because a hazard is assessed as a lower likelihood of occurrence. A simple assessment of L (Low), M (Medium), (High) is used for the assessment of probability of the occurrence.

Risk Assessment Matrix

LIKELIHOOD	CONSEQUENCE				
	Insignificant	Minor	Moderate	Major	Catastrophic
Almost Certain	S	S	H	H	H
Likely	M	S	S	H	H
Possible	L	M	S	H	H
Unlikely	L	L	M	S	H
Rare	L	L	M	S	S

H	High Risk
S	Significant Risk
M	Medium Risk
L	Low Risk

The identification of environmental aspects and impacts is important to the selection of environmental safeguards and work methods for operational activities such as maintenance.

Mltigation / Benefits Enhancement Measures

For effective and environmentally friendly operation of an industry, Reformation has outlined the potential impacts and risks of various environmental aspects that may occur in the facility.

Environmental Aspects	Potential Impacts	Identified Risk	Risk Rating	Operational Mitigation / Control Measures
Air Quality	Air Pollution & Dust Emission	Dust and other atmospheric emission from various chemical cleaners and company vehicle	Low	<ul style="list-style-type: none"> -Factory has face masks available for their use to prevent breathing in dust or chemicals -Esnure vehicles and compressors are well maintained -Dusty areas are cleaned frequently -Indoor plants to help improve air quality
Noise	Noise Pollution	Noise generation from operation of sewing machines and compressors	Low	<ul style="list-style-type: none"> -Use of personal protective equipment such as ear plugs are available to all employees -Generator / compressor work isolated to one location -Test and monitor for ambient noise and all areas within acceptable level
Waste Management / Disposal	Surrounding environmental pollution	Incorrect disposal of waste	Medium	<ul style="list-style-type: none"> -Disposal of waste separated into landfill, recycling, and compost bins throughtout the factory -Trash / recycling / compost pick ups 3x week by local waste buyer -Fabric waste recycled and picked up monthly -Needles and blades disposed of in hazardous material bins -Other chemicals disposed of through scheduled pick ups as necessary (batteries, electronics, etc.)

Dangerous Goods / Hazardous Material Handling	Contamination of surface	Accidental spillage from chemical storage due to unconscious handling	Low	-Chemicals not used on regular basis or in large quantity -Chemicals that are used have MSDS sheets that are available to employees -Proper inspection for maintenance and storage of chemicals conducted regularly
Traffic Pattern	Increase of vehicular traffic as well as gaseous emissions and risk of increasing road accidents	Vehicle increase	Low	-Adequate parking provided in the facility -Company vehicle gas efficient -Metro / Eco Commute program established - every employee can choose to either receive a free metro card or a parking pass

Environmental Management Plan

The EMP for Reformation has been prepared to address potential issues based upon discussion with factory management and workers. The EMP is additional to and compliments the factory's safety management program.

The following environmental issues that require environmental management plans based upon the potential impacts of activities by Reformation are as follows:

- Air Pollution / Dust Management
- Noise Management
- Waste Management
- Hazardous Chemical Management
- Energy Management

Air Pollution	
Objective	-To minimize the adverse impact to air quality caused by emissions from gas emission from boiler, generator, and dust from machine operations
Performance Indicator	-Nil complaints regarding air quality

Management Plan	<ul style="list-style-type: none"> -Cleaning team to clean and dust affected areas regularly and deep dust cleaning / removal scheduled monthly -Maintenance of boiler and generator conducted -No burning of waste materials onsite -Workers provided masks -Indoor plants in factory to help improve air quality
Monitoring & Reporting	<ul style="list-style-type: none"> -Monitor the ambient air quality
Responsibility	<ul style="list-style-type: none"> -Factory Manager - responsible for providing masks to worker and escalating any concerns to the Facilities Manager. Also responsible for regular maintenance of machines. -Facilities Manager - responsible for making sure cleaning team is conducting the regular dusting / cleaning to keep dust levels down

Noise Management

Objective	<ul style="list-style-type: none"> -To avoid noise complaints from workers in the factory from machines and generators -To comply with OSHA ambient noise standards
Performance Indicator	<ul style="list-style-type: none"> -Nil complaints on noise
Management Plan	<ul style="list-style-type: none"> -Use of personal protective equipment such as ear plugs are available to all employees -Generator / compressor work isolated to one location -Test and monitor for ambient noise and all areas within acceptable level
Monitoring & Reporting	<ul style="list-style-type: none"> -Monitor ambient noise level quarterly
Responsibility	Facilities Manager

Solid Waste Management Plan

Objective	<ul style="list-style-type: none"> -To minimize waste generation by developing strategies for the disposal of all waste that is sustainable and sensitive to the environment
Performance Indicator	<ul style="list-style-type: none"> -Nil complaints on waste storage or removal

Management Plan	<ul style="list-style-type: none"> -The factory does not dispose of any kind of solid waste on the factory premises and does not dump anything into the surface water -Solid waste is stored properly in bins -Hazardous material waste is stored separately -Solid wastes are handed over to Waste Management for responsible disposal 3x week -Hazardous waste is picked up by separate provider when needed -Waste, Recycling, and Compost storage clearly labeled for employees to know where to put their waste -Reminders to employees about proper waste disposal
Monitoring & Reporting	-Inventory of waste disposal available from Waste Management
Responsibility	Facilities Manager
Hazardous Chemical Management	
Objective	<ul style="list-style-type: none"> -Reduce the risk of contamination from fuels, oils, and hazardous wastes -Respond effectively to incidents such as spills and leaks
Performance Indicator	<ul style="list-style-type: none"> -Reduction in hazardous chemicals -Reduction in chemical accidents
Management Plan	<ul style="list-style-type: none"> -All hazardous or toxic substances are kept in safe containers labeled with details of composition, properties and handling information -Hazardous substances are placed in leak proof containers to prevent spillage -MSDS are provided at the storage location of each chemical -Dispose of hazardous chemicals in accordance with Occupational Health and Safety and environmental requirements -All personnel using hazardous chemicals are provided proper training
Monitoring & Reporting	-Spills and release of chemicals must be reported and documented immediately
Responsibility	<ul style="list-style-type: none"> -Factory Manager - responsible for daily check of chemical storage and providing proper training -Facilities Manager - responsible for MSDS sheets and making sure proper storage is provided -HR Manager - responsible for recording and reporting any accidents
Energy Management	
Objective	<ul style="list-style-type: none"> -Minimize electricity use results from site equipment and workplace lighting -Comply with standards of energy use
Performance Indicator	<ul style="list-style-type: none"> -Annual energy savings for all departmental facilities -Increased use of energy-efficient construction materials and appliances

Management Plan	<ul style="list-style-type: none"> -Energy saving lights are installed throughout the factory -Energy Star rating appliances purchased throughout the factory -Employees trained and reminded to turn off all machines and lights when not at work -Blue Box lighting installed to manage timing of lights in factory and offices when shifts end -Renewable energy credits purchased
Monitoring & Reporting	<ul style="list-style-type: none"> -Review energy consumption monthly to find out scope for energy savings
Responsibility	<ul style="list-style-type: none"> -Factory Management - responsible for daily check ins to make sure lights and machines are being turned off -Facilities Manager - overseeing monthly energy consumption, energy credit program, and purchasing and maintaining Energy Star appliances

Environmental Monitoring

Environmental Issues	Parameter	Recommended Monitoring Frequency
Air Quality	<ul style="list-style-type: none"> -Dust management -Ambient air emission 	-Biannually
Noise	<ul style="list-style-type: none"> -Noise level in decibel 	-Biannually
Waste Management	<ul style="list-style-type: none"> -Garbage collection -Cleaning & maintenance 	-Daily
Energy Consumption	<ul style="list-style-type: none"> -Electric use (kWh) -Electric demand (KW) 	-Monthly
Resources Usage	<ul style="list-style-type: none"> -All water taps shut off when not in use -Power to unused equipment shut at distribution panel 	<ul style="list-style-type: none"> -Daily -Daily
Hazardous Material	<ul style="list-style-type: none"> -Site inspection of storage and distribution -Emergency preparedness and personnel competence -Contamination investigation 	<ul style="list-style-type: none"> -Daily -Biannual -As needed