



2008

Environmental Policy

Metalworks is committed to environmental diligence in all phases of its operations and activities.

As a global socially responsible corporate citizen, we pledge to our employees, customers and community that we will strive to protect our environment and natural resources related to all of our operations. To that end we shall:

- **Comply with corporate, local, state and federal requirements as well as additional regulations.**
- **Minimize the environmental impact of our operations whenever feasible by promoting prevention of pollution, encouraging environmental resource conservation, and resource recycling.**
- **Maintain and initiate management programs that emphasize prevention, effective emergency preparedness, and response recovery plans.**
- **Integrate environmental, health and safety considerations into all key business decisions -including the design, production, distribution and support of our products and services.**
- **Correct any identified environmental problems and striving to continually improve in all areas of environmental management.**
- **Work with suppliers and customers to promote responsible use of our products.**
- **Encourage and educate our employees to take personal accountability for working toward protecting the environment and creating a safe and healthy workplace.**

The President and Environmental Health & Safety Manager have primary responsibility for establishment, maintenance, and implementation of this policy and related procedures. Metalworks has an active Environmental Management Program (EMP). The goal of the EMP is to achieve and maintain Clean Corporate Citizen (C3) status with the State of Michigan.

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SPECIFIC GREEN INITIATIVES

Reduced Water Consumption

Over the past two years, we've made several process improvements in our paint department which have resulted in a 50% reduction in water usage. Metalworks has reduced water consumption from 24 million gallons/year to 12 million gallons. Our goal is to further reduce our consumption within the next year to 7 million gallons/year, a 70% reduction over three years.

Reduced Energy Consumption

By improving routine maintenance procedures in the wash system of our paint line and experimenting with low temperature chemistry, we have reduced our consumption of natural gas by 12-15% over the past year. Our goal is to achieve an additional 10% reduction in the coming year.

Reduced Air Emissions

Over a five-year period, through paint and cleaning solvent reformulation initiatives combined with a shift to powder coating processes, Metalworks reduced our combined H.A.P. and V.O.C. air emissions by over 62%. These improvements have allowed us to opt out of the US EPA Title 5 Program for excessive air emissions.

Recycled Waste

Metalworks recycles all machine oil, paint solvents, cardboard, light bulbs and batteries. All scrap steel is efficiently segregated by type and recycled. All obsolete wet paint inventory is recycled by re-tinting to usable colors. Our scrap powder paint is collected during painting operation and then re-formulated to create a new utility textured color that is re-used to coat our internal components.

Powder Coating Technology

82% of all paint applied was via powder coat technology. Powder coat technology is utilized on all three paint systems currently in operation and across the entire breadth of our product line. Wet paint is only used for low volume Standard or special colors.

Pollution Prevention Opportunities

Metalworks conducts periodic internal environmental surveys with our employees. Each employee is asked to state their environmental concerns and how their present jobs help or hinder the environment. This data is used to direct the EMC agenda on how to lessen the environmental footprint upon our local community.

Health and Safety

Metalworks has a very active health and safety program with a working Safety Committee. Each year we invite the MIOSHA Consulting Education and Training reps in to inspect the plant for violations and suggest improvements.

Community Involvement

The EH&S manager currently sits on the Board of Directors of "A Few Friends of the Environment and the World" (AFFEW) the local environmental organization within Mason County Michigan. The EH&S Manager is also a member of the Mason County Emergency Planning Committee.

Metalworks is committed to nature and the stewardship of our Earth