



Assessment Report.

Windsor Machine & Stamping (US) Ltd.

Report Author Maureen Pococke
Visit Start Date 02/25/2013

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Introduction.

This report has been compiled by Maureen Pococke and relates to the assessment activity detailed below:

Visit ref/Type/Date/Duration	Certificate/Standard	Site address
7658378 Continuing Assessment (Surveillance) 02/25/2013 2 day(s) No. Employees: 214	EMS 540076 BS EN ISO 14001:2004	Windsor Machine & Stamping (US) Ltd. 26655 Northline Road Taylor Michigan 48180 USA

Client management system version(s):

Windsor Machine and Stamping Integrated Management Manual, dated 11-25-2011, Rev. 002

The continuing assessment of the Windsor Machine & Stamping (US) Ltd. EMS certification including the completeness and suitability of procedures and records, in assessing ISO 14001:2004 along with the BSI conditions of contract.

Management Summary.

Overall Conclusion

The overall conclusion of the audit is the areas assessed during the course of the visit were generally found to be effective and the management system is being maintained.

There were no outstanding nonconformities to review from previous assessments.

4 nonconformities requiring attention were identified. These, along with other findings, are contained within subsequent sections of the report.

A minor nonconformity relates to a single identified lapse, which in itself would not indicate a breakdown in the management system's ability to effectively control the processes for which it was intended. It is necessary to investigate the underlying cause of any issue to determine corrective action. The proposed action will be reviewed for effective implementation at the next assessment.

Please submit a plan to BSI detailing the nonconformity, the cause and your proposed corrective action, with responsibilities and timescales allocated. The plan is to be submitted no later than 03/26/2013 by e-mail or fax to your assessor, referencing the report number. Please send to pocockes@chartermi.net or .

Areas Assessed & Findings.

Opening and Closing Meeting/Environmental Policy/Changes 4.1/ 4.2/ 4.4.4/5

At the opening meeting, general introductions were made. There were no open notices of violation, court orders for operation or pending litigation for alleged environmental infractions, and there have been no reportable incidents, as confirmed by management throughout the

duration of the audit. At the closing meeting, the outcome of the audit was discussed.

The site has an environmental policy that has been signed by the CEO in 8-6-08. It meets the requirements of the standard and is being displayed throughout the site. EMR duties have been assigned to the new Safety and Health Coordinator. The site has added 40,000 sq ft to its operations and has started a new foam line to support making headrests for a major customer. The headcount has more than doubled with this additional manufacturing.

Aspects and Impacts, Significance 4.3.1/ 4.4.4

Reviewed PR-HR-001 Rev 2, Rev date July 14, 2009, FMEA Environmental Evaluation Criteria WHS005, Rev date 12-15-05 and Environmental Aspects, Objectives, and Targets Determination Rev. 7, Rev date 2-21-13. FMEA documents are developed for the various areas throughout the site. Aspects are determined for the individual areas and an RPN number is assigned to each aspect. Any aspect with a RPN value of 25 or greater is considered to be significant. Several FMEAs were sampled for the foam line, manufacturing area, battery changing area and the back yard. On the Environmental Aspects, Objectives, and Targets Determination documents there were 17 significant aspects identified yet when a cross reference was made with the corresponding FMEA, the RPN value was not 25 or greater. It is not clear from the documentation as to how significance is determined. See the non-conformance below.

Management Review/Objectives and Targets 4.6/ 4.3.3/ 4.5.1/4.5.4

A complete management review of the EMS is performed annually and took place most recently on April 9, 2012. The review is based on a review of the elements of the standard and it included all the requirements of the standard for management review except for the environmental performance of the organization. See the non-conformance below. There is also an opportunity to strengthen the records for the follow-up actions from the previous management review.

The site had one objective and target in 2012 and it was to reduce its foam waste by 30%. There were action items with responsibilities and target completion dates assigned. Progress toward this goal was monitored on a monthly basis but they are not achieving it on a consistent basis yet. 2013 goals are still being developed.

Legal and Other/Evaluation of Compliance 4.3.2/4.4.4/4.5.2

Reviewed the list of legal and other requirements to which the site subscribes dated 10-30-12. Regulations were associated with aspects on this list in a partial manner. There is an opportunity to more fully develop the list and other requirements the site fulfills so the site is implementing a CAR (022513-01) to address their legal and other requirements.

There was a compliance evaluation conducted by QSG on 11-8-12 with the report being issued 11-30-12. 20 non-compliances were noted in the report. Several CARs have been issued to address the non-compliances and updates to documentation are in process with the consultant. There is an opportunity to formalize a follow-up process for the non-compliances and opportunity for improvements that were noted in the report.

Internal Audits/Corrective Action 4.5.5/4.5.4/4.4.4/4.5.4

Reviewed the internal audit schedules for 2012 and 2013. The 2012 audits were conducted on Oct 26, 2012 and Nov. 11, 2012. The auditor was independent of the areas audited. All

processes were audited that were on the schedule and 3 non-conformances were found. Internal audit checklists were used and the audit notes were found to be satisfactory. There is an opportunity to review the checklists to assure the standard is being covered in its entirety.

Reviewed Corrective and Preventive Action PR-QA-005 Rev 8 Rev date July 14, 2009. The corrective action process includes all of the requirements of the standard. There is an opportunity to provide a description on how the CAR form is completed to support all of the requirements of the standard. CARs from the internal audit were reviewed although they are not closed yet. CARs from environmental incidents were reviewed and they demonstrated a full corrective action process.

External Grounds/Water Management 4.4.6/4.4.4/4.5.4

The facility and grounds were maintained sufficiently with the exception of the backyard. There was some equipment being stored that appears to be corroding. There were full oil drums and an empty used oil drum being stored other than the designated areas for these containers. There was a broken pallet in front of the storage area for the Absorbal. See the non-conformance below.

Reviewed the NOI that was sent to the state 9-5-12 to have the NPDES permit (MIS310633) re-issued. It is due to expire April 1, 2013. A cursory review was conducted for the SPCC and SWPPP. These documents are in need of review and update as identified in the compliance evaluation. Records that were reviewed were the monthly inspections for SPCC, PIPP, and SWPPP from 12-11, 12-12, & 1-13. The annual report for SWPPP effectiveness for 2012 was also reviewed.

Emergency Preparedness and Response 4.4.7/ 4.4.4/4.5.3/ 4.5.4

Reviewed PR-HR-002 Rev. 1, Rev. date July 14, 2009, Spill Response Instruction Rev. date 1-14-13, and Emergency Action Plan Rev. date 12-12-12. The site is required to do annual drills for the various emergency scenarios mentioned in the Emergency Action Plan. There were records for an evacuation drill, spill drill, and severe weather drill. Deficiencies during the drill were noted in the records as appropriate. Reviewed records from incidents 080312NS, 082112NS, and 102412. There were incident reports and CARs issued for all three. Information in these records support that there were improvements made to the system to eliminate the problems.

Training/Communication 4.4.2-3, 4.4.4/4.5.4

Reviewed Training Rev. 8, Rev date July 14, 2009. The site maintains a table for the site compliance training by each month for the year. As training is completed, an Excel spreadsheet is maintained to show who has completed the training. (Actual attendance records are maintained on sign-in sheets.) The only class that is required for all employees per site documentation is orientation training. When the records were reviewed on the Excel spreadsheet for orientation training, there were employees that had been at the site longer than the probationary period that did not have a record for having completed orientation training. There is no indication in the documentation as to what training is needed by employees with initial timing and refresher frequency. Reviewed the training slides for the 2013 14001 Awareness training. There is an opportunity to further develop the discussion of significant aspects in the training content. All the employees interviewed had completed this training.

Internal communications are achieved through postings, work instructions, contact with management, and training. Upper management is responsible for dealing with external communication. Significant aspects are communicated externally per direction from upper management.

Manufacturing/Site tour 4.4.6

An assessment of the facility operations was conducted throughout the work areas including Shipping, Receiving, Maintenance, Foam line, Assembly, Inspection, compressor room, and Stamping . The assessment included a walk through of the facility, observations of general conditions, fire extinguishers, chemical use and storage, waste storage, and observations of work practices including interviews with personnel. There were oil containers in the compressor room that do not meet the site storage requirements. (See the non-conformance below)

Most employees interviewed were able to speak knowledgably regarding principles of the environmental policy, specific job related issues dealing with the environment, and emergency preparedness, and where to go for additional resources when needed. They also confirmed that internal communications are taking place.

Energy Management 4.4.6/4.5.1/4.5.4

The site monitors electricity, natural gas, and water usage. Water usage is monitored per employee and the target for improvement that was achieved several years ago was 30 gal/day/employee. Today's values are less than half that amount for most months. There is an opportunity to reset an acceptable limit for water usage and establish acceptable limits for natural gas and electricity usage so the site can detect if they are having a possible issue.

Minor Nonconformities Arising from this Assessment.

Ref	Area/Process	Clause
A833688/1	Aspects	4.3.1

Details:	The system does not ensure in all instances that aspects are effectively addressed.
Requirements:	<p>Environmental aspects</p> <p>The organization shall establish, implement and maintain a procedure(s)</p> <p>a) to identify the environmental aspects of its activities, products and services within the defined scope of the environmental management system that it can control and those that it can influence taking into account planned or new developments, or new or modified activities, products and services, and</p> <p>b) to determine those aspects that have or can have significant impact(s) on the environment (i.e. significant environmental aspects).</p> <p>The organization shall document this information and keep it up to date.</p> <p>The organization shall ensure that the significant environmental aspects are taken into account in establishing, implementing and maintaining its environmental management system.</p>
Objective Evidence:	It is not clear from the documentation as to how significance for aspects is determined since the aspects that have been identified as being significant do not meet the stated requirement of having an RPN value of 25.

Ref	Area/Process	Clause
A833688/2	Management Review	4.6
Details:	The system does not ensure in all instances that management review is effectively addressed.	
Requirements:	<p>Management review</p> <p>Top management shall review the organization's environmental management system, at planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Reviews shall include assessing opportunities for improvement and the need for changes to the environmental management system, including the environmental policy and environmental objectives and targets. Records of the management reviews shall be retained. Input to management reviews shall include</p> <p>a) results of internal audits and evaluations of compliance with legal requirements and with other requirements to which the organization subscribes,</p> <p>b) communication(s) from external interested parties, including complaints,</p> <p>c) the environmental performance of the organization,</p> <p>d) the extent to which objectives and targets have been met,</p> <p>e) status of corrective and preventive actions,</p> <p>f) follow-up actions from previous management reviews,</p> <p>g) changing circumstances, including developments in legal and other requirements related to its environmental aspects, and</p> <p>h) recommendations for improvement.</p> <p>The outputs from management reviews shall include any decisions and actions related to possible changes to environmental policy, objectives, targets and other elements of the environmental management system, consistent with the commitment to continual improvement.</p>	
Objective Evidence:	Although the Environmental Aspects, Objectives, and Targets Determination document shows that many environmental parameters are monitored, there was no evidence that environmental performance was	

	included in management review.
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Ref	Area/Process	Clause
A833688/3	External Grounds/Site tour	4.4.6
Details:	The system does not ensure in all instances that operational controls are effectively addressed.	
Requirements:	<p>Operational control</p> <p>The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by</p> <ul style="list-style-type: none"> a) establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets, and b) stipulating the operating criteria in the procedure(s), and c) establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors. 	
Objective Evidence:	There were examples of oil containers that were not being stored per the site requirements in the backyard and compressor room.	

Ref	Area/Process	Clause
A833688/4	Training	4.4.2
Details:	The system does not ensure in all instances that training is effectively addressed.	
Requirements:	<p>Competence, training and awareness</p> <p>The organization shall ensure that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact(s) identified by the organization is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.</p> <p>The organization shall identify training needs associated with its environmental aspects and its environmental management system. It shall provide training or take other action to meet these needs, and shall retain associated records.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working for it or on its behalf aware of</p> <ul style="list-style-type: none"> a) the importance of conformity with the environmental policy and procedures and with the requirements of the environmental management system, b) the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance, c) their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and d) the potential consequences of departure from specified procedures. 	
Objective	-There were employees that had been at the site longer than the probationary period that did not have a	

Evidence:	record for having completed orientation training. -There is no indication in the documentation as to what training is needed by employees with initial timing and refresher frequency.
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Shift Details.

The shifts are identical in terms of process outputs and as a result it has been determined that the effectiveness of all shifts can be seen from outputs records and coverage within the normal assessment times.

Assessment Participants.

On behalf of the organization:

Name	Position
Nehal Shah	EMR
Beth Muse	Asst. Quality Mgr

The assessment was conducted on behalf of BSI by:

Name	Position
Maureen Pockocke	Team leader

Continuing Assessment.

The program of continuing assessment is detailed below.

Site Address	Certificate Reference/Visit Cycle	
Windsor Machine & Stamping (US) Ltd. 26655 Northline Road Taylor Michigan 48180 USA	EMS 540076	
	Visit interval:	12 months
	Visit duration:	16 hours
	Next re-certification:	02/01/2014

Re-certification will be conducted on completion of the cycle, or sooner as required. An entire system re-assessment visit will be required.

Re-certification Plan.

		Visit 1	Visit 2	Visit 3	Visit 4	Visit 5	Visit 6
Business area/Location	Date (mm/yy):	1/12	1/13	1/14			
	Duration (days):	1.5	2	4			
Air Management		✓		✓			
Contractor Management		✓		✓			
Water Management			✓	✓			
Waste Management		✓		✓			
External Grounds			✓	✓			
Chemical and Oil Management		✓		✓			
Emergency Preparedness and Response			✓	✓			
Manufacturing Processes		✓	✓	✓			
Training, Communication			✓	✓			
Aspects, Impacts, Objectives and Targets, EMPs		✓	✓	✓			
Management Review, Continual Improvement		✓	✓	✓			
Legal and Other Requirements		✓	✓	✓			
Internal Audits, CA/PA		✓	✓	✓			
Energy Mgt			✓	✓			
Compliance Evaluation			✓	✓			
Reassessment				✓			

Next Visit Plan.

Visit objectives:

The re-assessment of the Windsor Machine & Stamping (US) Ltd. EMS certification including the completeness and suitability of procedures and records, in assessing ISO 14001:2004 along with the BSI conditions of contract.

Visit scope:

The management of environmental risks associated with the manufacture of formed cold headed steel auto linkage rods and rod assemblies and coined, pierced, welded and broached steel wire products, headless bolts, headrests, and related assemblies for the automotive industry.

Date	Assessor	Time	Area/Process	Clause
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Report Author **Maureen Pococke**

Visit Start Date 02/25/2013

02/10/2014	Maureen Pococke	8:00	Arrival	
		8:30	Opening meeting	
			Discussion of changes Site tour Policy Planning (Objectives, aspects) Legal and Other Evaluation of compliance Management Review	4.1-3, 4.5.2,4.6
		Noon	Working lunch	
			Internal audit Corrective actions Waste Management	4.4.6, 4.5.3, 4.5.5
		4:00	Daily Wrap-up	
02/11/2014		8:00	Auditor Arrival and Prep	
			Emergency Response Maintenance Dept. Monitoring and Measuring (calibration)	4.4.7, 4.5.1
		Noon	Working lunch	
			Air Management Water management Chemical and oil management	4.4.6
		4:00	Daily Wrap-up	
02/12/2014			External Grounds tour Contractor management	4.4.6
		Noon	Working lunch	
			Manufacturing processes HR/Training	4.4.6
		4:00	Daily Wrap-up	
02/13/2014		8:00	Communication Control of Documents/Records	4.4.1-3, 4.4.4, 4.5.4,
		Noon	Working lunch	
			Preparation for Reassessment Follow-up on audit trails Prepare report	

		4:00	Closing meeting	
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Please note that BSI reserves the right to apply a charge equivalent to the full daily rate for cancellation of the visit by the organization within 30 days of an agreed visit date. It is a condition of Registration that a deputy management representative be nominated. It is expected that the deputy would stand in should the management representative find themselves unavailable to attend an agreed visit within 30 days of its conduct.

Notes.

The assessment was based on sampling and therefore nonconformities may exist which have not been identified.

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Regulatory Compliance.

BSI conditions of contract for this visit require that BSI be informed of all relevant regulatory non-compliance or incidents that require notification to any regulatory authority. Acceptance of this report by the client signifies that all such issues have been disclosed as part of

the assessment process and agreement that any such non-compliance or incidents occurring after this visit will be notified to the BSI client manager as soon as practical after the event.