



IMC MAGNETICS CORP.
A Curtiss Wright Company

Environmental Management Procedure

Title	Number	Revision	Release Date
Environmental Management Systems Manual	EM-41000	K	2-2-09

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Revision History

Rev.	Page	Description of Revision	Date
N/C	All	Initial Release	8/21/01
A	7	Para 4.3.3.3: deleted entire paragraph...log requirement.	5/8/02
	8	Para 4.4.2.5: Added EM 44200	5/8/02
		Para 4.4.3.1: revised title of EM 44300 to read: Communications, Internal and External	5/8/02
	9	Para 4.4.6: deleted word "Structure" in the title of Operational Controls.	5/7/02
	10	Para 4.4.6.4: changed to read: "The EMS System Index provides a list of procedures that define this section, in addition to other IMC documents.	5/8/02
		Para 4.4.7, 4.4.7.1 & 2: Changed title of EM44700 to be Emergency Response Plan	5/8/02
	11	Para 4.5.2.2: inserted EM 45200 between with and procedure.	5/8/02
	12	Para 4.5.3.2.4: Changed title of EM 44700 to Emergency Response Plan	5/8/02
		Para 4.5.4.3: Inserted EM 45400 between with and QP...	5/8/02
B	12	Paragraph incorrectly identified under "Management Review" as paragraph 4.5. Changed to paragraph 4.6.	6/4/03
B	5	Environmental Policy revised to designate EMS refresher training to all employees in January of each calendar year, commencing January 2004.	6/4/03
C	All	Rewritten as the EMS Roadmap	12/1/05
D	All	Update to comply with ISO 14001:2004 and personnel changes	4/1/06
E	All	Update to comply with ISO 14001:2004 and personnel changes	12/27/06
F	3, 6, 7, 15	Update Targets and Objectives for FY 2007, update Table of Contents, Update Environmental Aspects, Update Evaluation of Compliance, Add Audit References	5/30/07
G	All	Revision to update system	9/6/07
H	Cover, 2, 4, 5, 6, 7, 8, 10, 11, 13	Signature name update, revision update, removed name and date, removed "in which", inserted targets, changed wording in 4.4.1.3, removed number 1 in 4.4.1.5 and added temporary employees, created form for file index and removed references to documents in section 4.4.4, added procedure reference numbers and removed reference to Tier II in 4.4.6 #1 due to the fact IMC files exempt, added procedure references, changed EHS to ER and name change throughout, changed semi-annual to annually	11/9/07
J	All	Signature name update, inclusion of Curtiss Wright Controls (CWC) with IMC, correction made to 4.3.1(2) Storm Water permit number 13949, 4.3.2(4) Regulatory Compliance Calendar removed and replaced with annual review of legal requirements, 4.3.3	8/8/08

		heading changed to Objectives, Targets and Goals, 4.3.3(1) updated OT&G “to have an increase in sales that is 5% above and beyond any increase....”, 4.3.3(2) replaced “Review of Regulatory Compliance Calendar” with “Overview of legal and other requirements”, 4.4.3.2(5) added “Emergency Response Plan (Ref. EM-42000)”.	
K	All	Signature name update/ changed CWC/IMC to CWC/IMC throughout/ Form EMF-44300 renumbered and removed from procedure/ 4.2.3-changed to read Objectives, Targets, and “Programs” (instead of Goals), updated OTP/ added paragraph 4.3.2.1/ Environmental File Index removed from procedure/ reviewed content.	1/30/09

1.0 Scope

Curtiss Wright Controls/IMC Magnetics (CWC/IMC) is governed by numerous local, state and federal environmental regulations and associated permits. Many of the regulations and permits have specific monitoring, reporting and documentation requirements. CWC/IMC does not intend to waste resources by duplicating documents that serve dual purposes of ensuring compliance with regulations as well as ISO 14001:2004. This procedure is intended to act as a "Roadmap" to the location where applicable environmental documents and records may be found.

This procedure allows anyone not familiar with CWC/IMC's environmental program to locate the environmental documents and information noting the way we conduct business. This document identifies the location of EMS informational documents (e.g. Waste Management Plan, Stormwater Pollution Prevention Plan, Emergency Response Plan, etc.), and discusses topics that are not found elsewhere (e.g. communications, organizational responsibilities, environmental aspects).

2.0 Normative references

No normative references cited.

3.0 Terms and Definitions (From ISO 14001:2004)

Environment: The surroundings in which the Company operates, including air, water, land, natural resources, flora (flowers), fauna (animals), humans, and their interaction.

Environmental Aspect: An element of the Company's activities, products, or services, which can interact with the environment. A significant environmental aspect can have a significant environmental impact.

Environmental Impact: Any change in the environment whether adverse or beneficial, wholly or partially resulting from the Company's activities, products, or services.

Environmental Management System: That part of the Company's overall management system which includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, reviewing, and maintaining the environmental policy.

ER: Environmental Representative

4.0 General Requirements

This procedure establishes CWC/IMC comprehensive Environmental Management System (EMS). The EMS provides a structure for integration of environmental management with the regular business operations, with the overall goal of continuing improvement of environmental protection and prevention of pollution associated with the activities, products, and services. CWC/IMC's EMS is intended to meet all requirements of ISO 14001:2004.

4.1 Environmental Policy and Commitment

The environmental policy establishes the company's attitude and commitment to the environment in accordance with regulations, permits, ISO 14001:2004, and industry best practices. All subsequent actions and decisions will be judged against the policy. (ISO 14004:2004)

CWC/IMC will review the environmental policy at a minimum annually at the management review or as changes in the process warrant. The Policy is available:

- On the Environmental Bulletin Boards located in both the 1900 and 1920 buildings;
- Provided to employees during new hire training and annual refresher training;
- To the public upon request.

The Environmental Management System includes the organizational structure, responsibilities, policies, practices, procedures, processes and resources for maintaining compliance with the CWC/IMC Environmental Policy.

4.1.1 CWC/IMC's Environmental Policy

- *CWC/IMC is committed to the protection of the environment by maintaining high environmental quality standards which meet or exceed those required by regulations or customers.*
- *CWC/IMC will ensure that it has management systems and resources to identify, control, and monitor environmental risks associated with our operations.*
- *CWC/IMC will cultivate continuous improvement of environmental awareness and pollution prevention.*

4.2 Planning

The following section identifies CWC/IMC's environmental aspects that will be reviewed at minimum annually or if the processes change.

4.2.1 Environmental Aspects

1. The process CWC/IMC uses to determine environmental aspects are; permit requirements, customer requirements, process mapping of inputs/outputs, chemical review and analytical data. The following having been identified as Environmental Aspects of CWC/IMC's operations:

Air	Classification	Action
Paint booth emissions	Significant	Filtered
Fugitive VOC emissions	Insignificant	Filtered, closed container
Fugitive Emissions from blasting	Insignificant	Enclosed interior room
Water		
Oakite wastewater pH adjust and disposal	Insignificant	Good housekeeping
Groundwater-drywell monitoring on site-limited	Significant	Absorption sponges
Groundwater	Significant	Addressed under WQARF by previous owner
Waste		
Weekly solid waste inspection	Significant	Pollution prevention
Hazardous waste	Significant	Pollution prevention, waste management plan

2. CWC/IMC currently operates under the following permits:
 - Air Permit No. 960834 issued by Maricopa County Air Quality Department
 - Industrial Waste Water permit No. 129533 issued by City of Tempe
 - Storm Water Permit AZMSG-13949, issued by ADEQ
 - Hazardous Waste EPA ID AZD008394355, issued by EPA Region 9
3. The following are revisited on an annual basis:
 - Waste Management Plan (WMP)
 - Storm Water Pollution Prevention Plan (SWPPP)
 - Best Management Practices (BMP)
 - Material Safety Data Sheets (MSDS)
 - Emergency Response Plan (ERP)

4.2.2 Legal and Other Requirements

1. CWC/IMC is regulated under the following acts and their associated regulations:
 - a. Clean Water Act & Amendments (CWA)
 - b. Clean Air Act & Amendments (CAA)
 - c. Resource Conservation and Recovery Act & Amendments (RCRA)
 - d. Emergency Planning and Community Right-to-Know Act (EPCRA)
 - e. Toxic Substances Control Act (TSCA)
 - f. Hazardous Materials Transportation Act (DOT)
 - g. Occupational Safety & Health Act (OSHA)
2. The State of Arizona, Arizona Department of Environmental Quality (ADEQ) has primacy over the above listed environmental programs and therefore has corresponding legislation.
3. The State of Arizona, Arizona Department of Occupational Safety and Health (ADOSH) has primacy over the OSHA programs and therefore has corresponding legislation.
4. To keep current of existing regulations, changes to regulations and upcoming legislation, CWC/IMC staff utilizes Corporate Counsel and/or third-party consultants as necessary, and participates in Environmental and Industry Organizations. EM-43200 discusses in detail CWC/IMC's legal requirements and how they are associated with the processes. This procedure provides for an annual review of the inventory of legal requirements with additions, deletions, or modifications being made as necessary to assure the inventory is current.
5. Legal council is used, as required, to address outstanding environmental issues and to review environmental documents to minimize CWC/IMC's legal liabilities.

4.2.3 Objectives, Targets, and Programs

Objectives, Targets and Goals will be a result of the Environmental Management Review (EMR) process, which will be held at a minimum annually. Standard objectives are as listed but may change at the time of an Environmental Management Review:

Objectives/Targets (2009)

- 1) Reduce waste haul off volume by 10%
- 2) Reduce VOC air emissions by 15%
- 3) Employee Awareness

Programs

- 1) Recycle used oil
 - 2) Recycle waste coolant
 - 3) Annual PM of air scrubber
 - 4) Annual PM of paint booth
 - 5) Employee Training
1. The ER will present to the Management Staff the following: (at minimum)
 - a. Compliance with current permits
 - b. Waste generation – hazardous, non-hazardous, universal
 - c. Overview of legal and other requirements
 - d. Any issues/corrective actions or improvements identified in last review
 - e. Audits conducted both internal and external
 - f. Process changes if applicable
 2. A record will be kept of any action items identified in the Environmental Management Review by the ER or designee. Task assignments, if necessary, will be assigned to the pertinent party.
 3. Hard copy of Environmental Management Reviews will be maintained in the ER office and on the network under the Environmental Management Review folder.

4.3 Implementation and Operation

4.3.1 Resources, Roles and Responsibilities

At CWC/IMC, the Environmental Representative (ER) reports to the Vice President. The rank and status of the Environmental Representative is equal to other direct reports at the site. This complies with ISO 14000 standards.

It is the responsibility of the ER to be a knowledgeable resource for all other departments. The ER is responsible for information management of regulatory and permitting requirements, and the possible consequences of operating outside the permit conditions. The ER also: initiates new programs; provides support for, or management of existing programs; informs site personnel of upcoming legislation; provides ongoing education about environmental programs and issues; performs standard environmental functions, such as sampling, monitoring, and reporting. The job description and requirements are maintained in the Human Resource file. It is controlled and governed under HR-01002.

4.3.2 Site Management – CWC/IMC Management Staff

Awareness of environmental issues and compliance with the regulations and permits is the responsibility of every employee and contractor working at CWC/IMC. As such, environmental responsibilities are written into job descriptions (Ref. HR-01002).

4.3.2.1 CWC/IMC has the responsibility to inform visitors of their responsibility for complying with the CWC/IMC's ISO-14001 guidelines.

Upon arrival, visitors to CWC/IMC are required to log into the Daily Visitors Log Book. In this log is a question (column) that asks if the visitor has read and understood the ISO-14001 brochure. If marked "YES", the visitor is allowed to proceed. If marked "NO", the visitor will be given an ISO-14001 brochure to read by the receptionist or designee. After reading, the visitor is to mark "YES" in the log book and will then be allowed to proceed

A statement of environmental requirements is stated on the purchase order and agreed to by the supplier of the service prior to start of work.

Leased or rented equipment will be reviewed for possible impacts in accordance with regulatory permits.

In addition, management will participate in a formal review of the EMS for continuing appropriateness, adequacy, and effectiveness at least annually.

4.3.3 Non-Management Employee Responsibilities

Job descriptions for general staff include environmental, health & safety responsibilities (Ref. HR-01002). Refresher training is provided to the employees annually at a minimum.

4.3.4 Resources

1. The ER has assigned representatives to assist in the implementation, maintenance and review of all environmental programs within all areas of operations.
2. The ER and representative(s) are responsible for facility maintenance, including the management of hazardous, non-hazardous and universal wastes, satellite accumulation points and hazardous waste storage facilities.

4.3.5 Competence, Training and Awareness

CWC/IMC provides training to all employees, not only for compliance with the various regulations, but also so that employees can participate in idea development and, whenever possible, decision making. The following training has been identified as being necessary:

1. New Hires/Temporary Employees– all new hires must attend OSHA mandated Hazard Communication training that also includes addressing environmental concerns. Some topics covered include:
 - a. Introduction to the Work Environment
 - b. Hazard Recognition
 - c. Emergency evacuation plans
 - d. Electrical hazards-ESD
 - e. Health hazards-MSDS
 - f. Stormwater-SWPPP
 - g. Industrial Wastewater
 - h. Waste Management
2. Annual refresher training is attended by all employees. The refresher training includes the same topics as the new hire training yet in more detail, generally speaking.
3. Employees working directly with hazardous waste or product must attend RCRA (refresher) training at least annually.
4. Employees involved in shipment of hazardous waste or product must attend DOT (refresher) training at least every three years.
5. Management is provided with training regarding the legal aspects of the environmental regulations and permits at least annually. Both federal and state regulations have language which can hold individual managers responsible for environmental incidents. As such, it is important that individual managers be informed of their liabilities. This information is updated during Environmental Management Reviews and is provided by the ER or designee. Attendees are required to sign an attendance log which is kept in the environmental files or by HR in the individual employee's file (Ref. QF-18001).

4.3.6 Communications

Internal Communications

The following methods are used to communicate information about environmental topics, issues, permit conditions, etc. to CWC/IMC employees. Attendance sheets are kept for each meeting where environmental issues are discussed and are kept in the environmental department files or in the HR files.

1. All employee meetings – held as needed
2. Bulletin Boards – updated as needed
3. Handouts, newsletters or bulletins – as needed
4. Staff meetings
5. Departmental meetings - as needed
6. Environmental issues are relayed to the Vice President by the Environmental Representative (ER) or designee.
7. New Hire orientation
8. Annual Board Meetings/Reviews

External Communications

1. Communications with regulatory agencies are generally handled by the ER. All communications are documented either through an e-mail, letter, or a note to the file.
2. CWC/IMC considers regulators to be team members and includes them in existing and upcoming projects to the extent practicable.
3. Unsolicited inquiries about environmental issues are directed to the ER.
4. All meetings and verbal or written communications with neighbors or community associations are documented and reviewed with management and then filed.
5. Emergency Response communications are discussed in the Emergency Response Plan (Ref. EM-42000).
6. All written communication with external environmental governing agencies, i.e. Maricopa County or ADEQ, will have this statement placed at the end of the document above signature.

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of the persons or persons who manage the system, of those directly responsible for gathering the information, the information submitted is, to the best knowledge and belief, true, accurate, and complete. I am aware that there are signification penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

4.3.7 Documentation and Records

Environmental records are kept in accordance with regulations or permit requirements. All environmental-related documents may be found in the ER office listed under a file index EMF-41000-1. All documents are generally maintained a minimum of five (5) years unless otherwise stated in the specific procedure. Hazardous or non-hazardous waste manifests may be destroyed after three (3) years.

4.3.8 Control of Documents

CWC/IMC is an AS-9100 certified facility. All documents are controlled in accordance with AS-9100 guidelines (Ref. QP-05001, QP-05002, QP-05003).

4.3.9 Environmental Management Programs and Operational Controls

This Environmental Management System (EMS) provides the information needed for the facility to obtain and remain in compliance with the various Federal and State regulations and ISO Best Practices. The above information is located in the many programs already in existence at the facility. The following information discusses the various programs where the EMS information may be found:

1. The Emergency Response Plan procedure, a controlled document, provides checklists, maps, evacuation plans, incident response, contact (response) personnel and their contact phone number(s). This procedure is reviewed at least annually and updated as required. This procedure is identified as EM-42000 – Emergency Response Plan.
2. The Stormwater Pollution Prevention Plan (SWPPP) procedure addresses potential storm water pollutant sources at the property, and the Best Management Practices (BMP) incorporated to prevent spills or releases, and outlines appropriate responses should they occur. Most storm water on the property is directed to one of four dry wells, allowing the storm water to recharge into the aquifer. CWC/IMC has registered the dry wells and maintains the wells in accordance with the Dry Well Maintenance. Quarterly visual inspections will be completed and results documented, after which determinations will be made by the ER if any additional actions need to be taken. Employees attend annual training covering the requirements of the SWPPP.(EM-43000)
3. The Waste Management Plan (WMP) procedure includes information regarding the identification of each waste stream, the management of solid and hazardous waste, CWC/IMC's recycling program, and a list of report quantities that are applicable to the site. This procedure is reviewed at least annually and updated as necessary. EM-44000 – Waste Management Plan

4. CWC/IMC operates under a City of Tempe Industrial Waste Water Permit. The waste water permit requires CWC/IMC to maintain a spill plan specific to CWC/IMC. This plan must be updated at least every two years. The plan is available in the environmental files and is incorporated as an Appendix to the Emergency Response Plan procedure. This procedure is identified as EM-42000.
5. The various elements of the EMS are reviewed at least annually as discussed in section 4.3.2 of this document.
6. Operational Controls

Operational controls are physical or operational methods of ensuring that CWC/IMC is operating within the letter and intent of regulatory permits, regulations, and ISO Best Practices. The following control measures are currently being utilized at CWC/IMC:

- Documented weekly hazardous waste inspections.
- Weekly inspection of recycling storage facilities.
- Quarterly maintenance of a fugitive VOC log.
- Daily log of paint usage.
- Quarterly storm water and dry well inspection.
- Weekly inspections of Satellite Accumulation Points.

4.3.10 Emergency Preparedness and Response

The emergency response planning required by various regulatory agencies has been combined into a "One Plan" format, as authorized by EPA. The plan is discussed in Section 4.3.9, No. 1.

The City of Tempe (COT) requires the preparation and implementation of an Accidental Discharge and Spill Plan. This Spill Plan is submitted on a COT standard form. The various elements of the COT Accidental Discharge and Spill Plan are included in the ERP as an Appendix.

4.4 Checking

4.4.1 Monitoring and Measurement

The most obvious monitoring being performed on a routine basis is in conjunction with the storm water, waste water, hazardous waste, and air permits. How measurements are being collected and documented are addressed in the procedures that govern them.

4.4.2 Evaluation of Compliance

1. Internal audits will be conducted as per audit schedule. Reference procedure QP-17001 Section 7.2.
2. Third-party audits will be conducted as directed by certification or permit requirements.
3. Audit findings are maintained in the Environmental files in hard copy and electronically on the network.

4.4.3 Corrective Action

Corrective actions are managed in accordance with QP-14001 guidelines.

4.4.4 Control of Records

Procedures for the identification, storage, protection, retrieval, retention and disposal of records are established by the following procedures; IT-05001/Information Save Procedure, IT-05002/Information Security Procedure, QP-05001/Procedure Creation & Change, QP-05002/Document and Data Approval, Issue, Change and Incorporation, QP-05010/Procedure for Revision & Obsolesce of Records & Documents, QP-16001/Control of Quality Records.

4.4.5 Internal Audit

As stated in section 4.4.2, audits to determine compliance with internal procedures, regulatory requirements, and customer requirements are conducted per the audit schedule. Reference procedure QP-17001 Section 7.2

4.5 Management Review

The management review committee consists of all department heads. The Environmental Management Review (EMR) will be conducted as discussed in section 4.3.2 of this procedure.

4.6 Records

Record Description	Collection On-site	Location Off-site	Indexed by	Filing Media	Retention Period
*See specific procedures	Yes	None	*	*	*