



**ENV-00001**

**Revision 8**

## **Environmental Manual**

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Quality Department.

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## ENVIRONMENTAL MANUAL SIGNATURES

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Chief Financial Officer

*Charlie Phillips*

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Vice President

*Karen Craig*

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Vice President

*Jim McKain*

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Human Resources Manager

*David Delaney*

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Corporate Quality Manager

*Steve Berteotti*

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EHS Manager

### Environmental Policy

We are committed to doing what is right to protect the environment by:

- Managing used resources properly
- Monitoring and improving our processes to reduce waste and protect the environment
- Compliance with all applicable regulations
- Training all affected employees
- Being a good neighbor
- Incorporating sustainability into our business model

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## I. CORPORATE PROFILE

Penn United Technologies Inc., is an industry leading manufacturing facility that provides precision metal manufacturing solutions for customers around the world; from prototype to production. Our complete range of manufacturing services allows customers to simplify their supply chain logistics by using Penn United's "one-stop shop" manufacturing services.

Whether the need is for a single prototyped piece, millions of precision metal components, or a complete turnkey assembly operation, Penn United Technologies offers a highly skilled work force that takes pride in responding to customers' toughest applications. Above all, Penn United Technologies Inc. is founded on its core values of integrity - and that's what gets passed on to every customer.

## II. INTRODUCTION

This manual describes the policies and procedures implemented by Penn United Technologies Inc., to ensure that we are controlling our impacts on the environment. This manual defines the requirements and structure for the Penn United Environmental System which is registered to ISO 14001.

In addition, Penn United's system is designed to apply policies and procedures to be compliant with the RoHS Directive.

This manual defines corporate-level Environmental system policies. The detail of how these policies are implemented is described in corporate, organizational, and process level procedures. The description of these processes is further supported by work instructions, flowcharts, and process maps located in the document control database. Evidence that these key processes are operational and effective is evident by the Quality Management System.

## III. SCOPE

Penn United Technologies, Inc., provides stamping, plating, precision assembly, carbide components, carbide and steel assemblies, production machining, tooling, automation processes, additive manufacturing (3-D printing), as well as the design to customer specifications, manufacturing, and development of dies.

When determining the Scope of the environmental management system Penn United Technologies has considered external issues, internal issues, interested parties and their compliance obligations (see QAM-00003 Context of the Organization). See section V. for responsibilities, authorities, and communication.

### A. Exclusions and Justifications

1. For ISO 14001 Penn United Technologies
  - a. None

Also, this manual highlights key Environmental areas located inside and outside the facility that are designated waste storage areas and other Significant Environmental Aspects. Boundary site maps are identified in Section XXIV of ENV-00002.

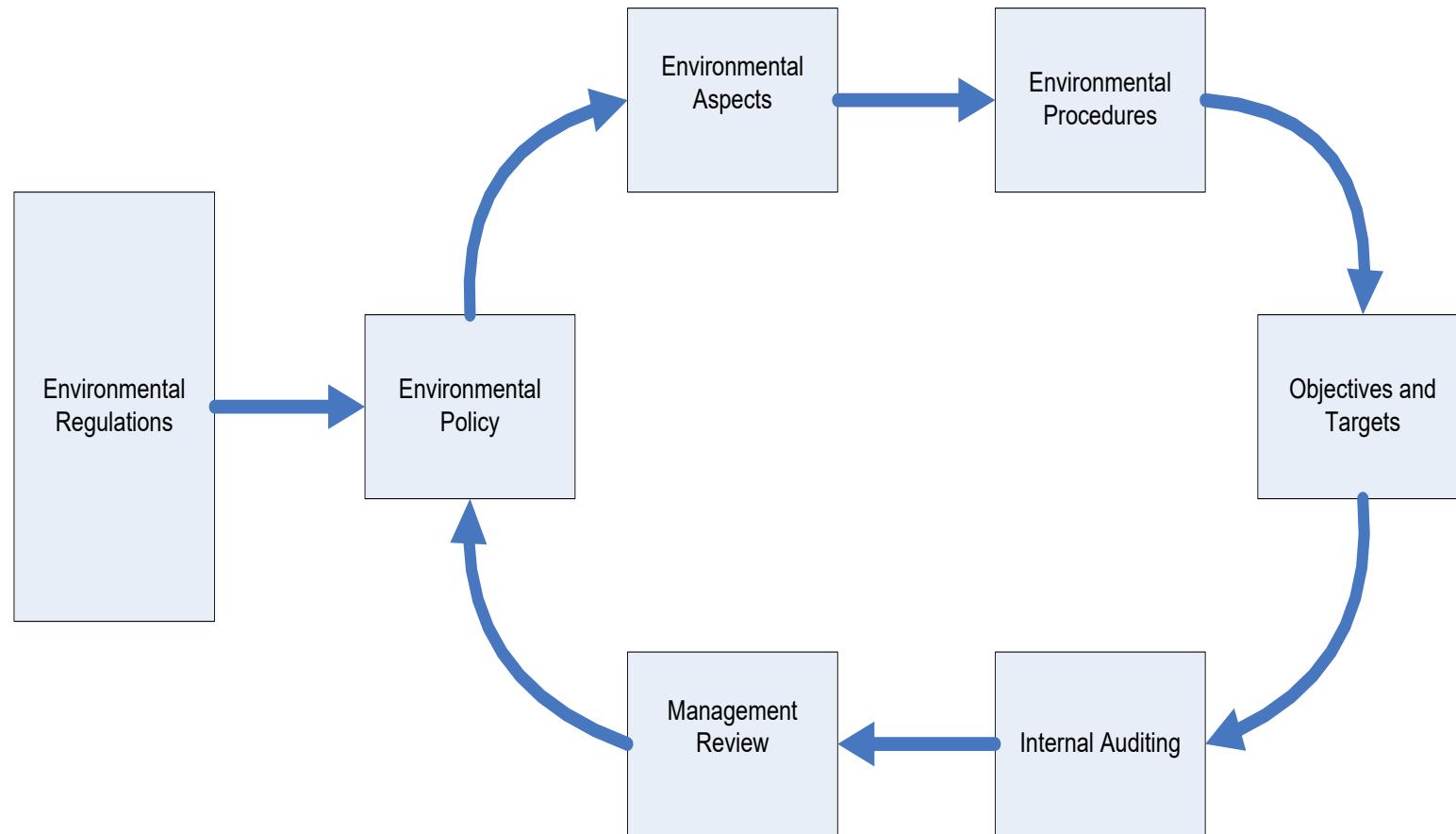
## IV. ENVIRONMENTAL BUSINESS STRATEGY

Penn United Technologies Inc. has established, documented, implemented, and is maintaining the following Environmental Management System as a means of implementing the processes necessary to ensure that product and services conform to specified requirements. The Penn United Environmental System encompasses all applicable requirements of ISO 14001. The diagram defines the interaction of key processes demanded in order to meet the requirements of this international standard.

Penn United Technologies Inc. has established measurements for each one of the processes referred to in the Aspect list to achieve the Environmental objectives, which were set forth by Executive Management. Environmental objectives shall be consistent with the environmental policy, measurable (if practicable), monitored, communicated and updated as appropriate.

Lifecycle perspective is also considered and reviewed as indicated on the Aspect List.

#### A. Penn United Environmental System



## V. RESPONSIBILITY, AUTHORITY AND COMMUNICATION

Penn United Executive Management defines and communicates the responsibility and authority to implement and maintain the Environmental System through the approved documented procedures.

The Management Representative, appointed by the Executive Management, is the EHS Manager. The EHS Manager has the responsibility and authority to ensure processes needed for the Environmental System are established, implemented and maintained. This position reports to Executive Management on the performance of the Environmental System and any need for improvement to ensure the promotion of awareness of customer requirements throughout the organization.

The EHS Manager has the responsibility to ensure the environmental system stays current to all governing laws and also acts as the liaison between Penn United and external parties on matters related to the Environmental System. Significant Aspects will not be communicated to the public.

## VI. PROCEDURE OVERVIEW

### A. Internal Auditing (OP-00010)

This procedure has been established to define the processes of scheduling and conducting internal audits of Penn United's Quality Management System. These include system, product, and process audits. Follow-up audit activities are implemented and tracked for effectiveness if a corrective action is issued. Each audit process is defined and the frequency established in the Internal Auditing procedure.

### B. Management Review (OP-00011)

The process of reviewing the business systems of Penn United Technologies Inc. is defined in this procedure. It includes group, EHS and executive management review.

### C. Corrective and Preventive Action (OP-00012)

This procedure identifies corrective and preventive action (CAR & PAR) steps. On-time completion and review and the CAR and PAR effectiveness are the objectives.

### D. Continual Environmental and Safety Improvements (OP-00013)

This procedure pertains to continuous improvement projects within Penn United Technologies Inc. and defines the process objectives.

### E. Context of the Organization (QAM-00003)

This document defines Interested Parties, Internal and External Issues that are relevant to Penn United Technologies Inc., purpose and strategic direction.

### F. Emergency Action Plan (SAF-00001)

This procedure establishes and maintains a system to ensure employee safety from fire and other emergencies on all campuses of Penn United Technologies (PUT). It provides a written documentation detailing the actions and procedures to be followed in case of an emergency and to set standard practices for minimizing loss in emergency situations.

### G. Contractor Safety and Environmental (SAF-00008)

This procedure establishes and maintains a system to ensure Contractors perform work in a safe and environmentally conscious manner, using industry recognized practices. Procedure ensures that all contractors performing work at Penn United Technologies Inc. have an approved status. Also to ensure that Contractors understand hazards they may encounter while doing physical work on site at Penn United Technologies.

- H. Document Control (OP-00015)  
Internal and external documents required by the Quality Management System are controlled. This procedure establishes the steps necessary to ensure documents are approved for adequacy prior to release. External documents are identified and distribution controlled to prevent the unintended use of obsolete documents.
- I. Record Control (OP-00016)  
Records required by the international standard have been established, maintained and are controlled. A documented procedure has been established to define the controls needed for the identification, storage, protection, retrieval, retention time and disposition of records.
- J. Training (OP-00017)  
This procedure pertains to training activities performed at Penn United Technologies Inc. The needs of all employees are identified and training is scheduled, performed and evaluated accordingly.
- K. Purchasing (OP-00019)  
The process used for suppliers of raw materials and outsource suppliers is explained in this procedure. The purchasing process and the supplier management process are defined.
- L. Control of Measuring Equipment and Systems (OP-00020)  
This procedure establishes and maintains a system to control, calibrate, and maintain the Inspection, Measuring and Test equipment (IM & TE) within Penn United Technologies Inc.
- M. Risk Assessment (OP-00025)  
This procedure established and implemented for managing risks and opportunities throughout Penn United Technologies Inc.
- N. Management of Change (OP-00026)  
This procedure establishes a process to control changes to our business management system. This would include significant changes to procedures, processes, or equipment that could affect products and services, health and safety, the environment or other factors impacting the organization and interested parties identified by Penn United Technologies, Inc.
- O. Contingency Plan (CP-00002)  
The purpose of the contingency plan is to define the procedures for contingency actions required in emergency situations, to prevent work stoppage or discontinuation of service to customers as a result of an emergency.
- P. Main PPC Plan (ENV-00002)  
This procedure covers all elements of the following State and Federal Pollution Incident Prevention and Emergency Response Requirements as outlined.
- Q. Hazardous Waste Management (ENV-00004)  
This procedure defines the process for the collection, handling, labeling and disposal of hazardous waste to ensure compliance with regulations and reduce potential for environmental damage.
- R. Recycle and Waste Material Storage Management (ENV-00005)  
This procedure ensures an efficient, safe and compliant waste and drum management program for hazardous or non-hazardous (residual) wastes and materials stored in containers for reuse, recycle or disposal.
- S. Battery Collection and Recycle (ENV-00006)  
This procedure defines the process for the handling and collection of used lead acid, alkaline, lithium ion cap style and other specialty batteries and ensures they will not create a hazard following disposal.

- T. Aerosol and Small Gas Containers Handling (ENV-00007)  
This procedure defines the process for the handling and collection of aerosol containers and small gas cylinders and ensures they will not create a hazard following disposal.
- U. Residual Waste Management (ENV-00008)  
This procedure defines the process for the collection, handling, labeling and disposal of residual waste to ensure compliance with regulations and reduce potential for environmental damage.
- V. Environmental Reporting and Communication (ENV-00009)  
This procedure documents the annual reporting requirements for environmental compliance and covers requirement of Federal, State and Local agencies.
- W. On-Site Hazardous Waste Treatment (ENV-00010)  
This procedure defines the process for the storage, treatment, labeling and record keeping of hazardous generated and treated on site to ensure compliance comply with regulations and reduce potential for environmental damage.
- X. State Only Natural Minor Air Operating Permit (ENV-00011)  
This procedure establishes and maintains a system to ensure a valid operating permit is maintained, that Penn United complies with all conditions within the permit and changes are properly managed with the PA Department of Environmental Protection.
- Y. Disposal of Empty Paint Cans (ENV-00012)  
This procedure establishes and maintains a system to ensure empty or unused paint containers are properly managed for disposal.
- Z. Electronic Waste Recycling (ENV-00013)  
This procedure establishes and maintains a system to ensure the electronic waste is collected, stored and recycled in a manner that meets the state guidelines and not discarded into municipal waste dumpsters.
- AA. Waste Oil Handling and Recycling (ENV-00014)  
This procedure establishes and maintains a system to ensure the waste oil is collected and disposed in a manner that meets the state and federal regulations and is not contaminated with other waste that prevents it from being recycled for fuel blending.
- BB. Sanitary Wastewater Handling (ENV-00015)  
This procedure defines the process for collection and disposition of sanitary wastewater.
- CC. Biomedical Waste Management (ENV-00016)  
This procedure defines the process for collection and disposition of medical wastes.
- DD. Municipal Waste (Plant Trash) Management (ENV-00017)  
This procedure defines material that is considered municipal waste and the process for collection and disposal.
- EE. Greenhouse Gas Reporting (ENV-00018)  
This procedure establishes and maintains a system to assure compliance with EPA 40 CFR 98 for all Penn United locations.
- FF. Asbestos Abatement Demolition Inspection Notification (ENV-00019)  
This procedure establishes and maintains a system to ensure Penn United complies with both PA DEP and EPA NESHAP requirements for demolition and major renovations.

## GG. Aboveground Storage Tanks (ENV-00020)

This procedure establishes and maintains a system to ensure complies with the PADEP Aboveground Storage Tank (AST) regulations for the installation, inspection and maintenance of tanks.

## HH. Refrigerant Inventory and Control Plan (ENV-00021)

This procedure establishes and maintains a system to ensure compliance of Section 608 Refrigerant Recycling Rule of the Clean Air Act of 1990 for our facilities and equipment.

## II. Storm Water Discharge (ENV-00022)

This procedure establishes and maintains a system to ensure our storm water run-off meets the Federal, State and Local Storm water Regulations.

## JJ. Evaluation of Compliance (ENV-00023)

This procedure establishes and maintains a system to evaluate compliance with applicable legal requirements, statutes or other EHS obligations as they relate to the operation of our business.

## KK. Meeting Legal and Other Requirements (ENV-00024)

This procedure establishes and maintains a system to ensure the ability to identify and access documents to define legal or other obligations and determine how the requirements apply to environmental aspects.

## LL. Environmental Aspects (ENV-00025)

This procedure establishes and maintains a system to identify environmental aspects that have a significant impact on the environment. Taking into consideration lifecycle perspective and abnormal conditions

## MM. Handling of Fluorescent and Compact Fluorescent Lamps (ENV-00026)

This procedure establishes and maintains a system to ensure the proper handling and disposition of used fluorescent lamps of all types; ensuring prevention of breakage and possible exposure to Mercury.

## NN. Annual Environmental Training (ENV-00003)

This procedure puts important environmental processes in front of employees on an annual basis.

## OO. Sustainability Plan (SP-00001)

This plan outlines Penn United's key initiatives to achieving goal of 20% reduction in GHG by 2035.