



CURTIS INSTRUMENTS INC.
200 KISCO AVE
MOUNT KISCO, NY 10549 USA

OPERATING PROCEDURE

NO. EnvOP-00-01

PAGE 1 OF 22

DATE 6/30/11

REVISION B

ENVIRONMENTAL OPERATING PROCEDURE

Note: The revision level of this document and any referenced documents must be verified for latest issue before use

EnvOP-00-01

TITLE

**ENVIRONMENTAL MANAGEMENT
SYSTEM MANUAL**

	APPROVALS	DATE	REVISIONS (SEE SHEET 2)
WRITER	DH	3/10/08	
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ENGR	N/A		
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DISTRIBUTION

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1.1 PURPOSE

1.1.1 Curtis Instruments, Inc. developed and implemented the Environmental Management System (EMS) to:

- Improve its environmental management and, ultimately, to reduce the impact of its operations, activities, products, and services on the environment; and
- Assure itself of its conformance with its stated environmental policy.

1.1.2 The EMS system complies with the international standard ISO 14001:2004.

1.1.3 This EMS manual is divided into six sections modeled on the sectional organization of the ISO 14001 standard. Each section defines general policies and basic principles for the pertinent EMS processes and activities, summarizes responsibilities and methods, and references relevant EMS operational procedures and other documents.

1.1.4 The purpose of this manual is to define and describe the EMS, to define authorities and responsibilities of the management personnel involved in the operation of the system, and to provide a general description of all processes and activities comprising the EMS.

1.1.5 Another purpose of this manual is to present the EMS to customers, suppliers, regulators and other external interested parties, and to inform them of what specific controls are implemented at Curtis Instruments, Inc. to assure responsible and effective environmental management.

1.2 SCOPE:

Curtis Instruments' EMS is a corporate wide system. As each Curtis business unit is certified and registered to ISO 14001, this policy manual will then become effective. The procedures identified herein may be locally subsidized after approval by Corporate Headquarters. It is further applicable to contractors/service providers doing work inside any Curtis business unit.

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2.1 Environmental Policy

It is the worldwide policy of Curtis to design, manufacture and distribute all its products and to handle and dispose of all materials without creating unacceptable health, safety or environmental risks. The corporation will:

- Establish and maintain programs to assure that laws, regulations, and other requirements to which the corporation subscribes that are applicable to its products and operations are known and obeyed;
- Conserve resources and energy, minimize the use of hazardous materials and reduce wastes. Establish the commitment to the prevention and reduction of pollution to achieve minimal adverse impact on the environment;
- Stop the manufacture or distribution of any product or cease any operation if the health, safety or environmental risks are not acceptable.

To carry out this policy, the corporation will:

1. Operate in a manner which protects the environment, health, and safety of the citizens of the communities where we operate as well as our employees. Support local initiatives to improve community impact on environment.
2. Comply with all international, national, federal, state, and local environmental laws, regulations, and permits in countries in which we operate. Adhere to all codes of practice, and other environmental requirements to which the corporation subscribes. To achieve and maintain compliance, we will develop and maintain management systems for identifying relevant requirements and for monitoring performance of related activities.
3. Identify and control any health, safety or environmental hazards related to its operations and products.
4. Through the use of continuous improvement processes drive improvement in our environmental performance.
5. Communicate our environmental policy to all employees and to all others involved in or affected by our operations.
6. Respond openly and promptly to public inquiries about environmental issues our operations may create, and initiate communications with others who might be affected.
7. Managers and employees will promptly communicate to management significant environmental developments which may have an impact on employees, communities, or the public.
8. Strive to attain a uniform, world-wide environmental standard for processes and products.

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Stuart Marwell Signature on File Date: January 3, 2011

President

Dennis Houghton Signature on File Date: January 3, 2011

Management Representative

3.1 ENVIRONMENTAL ASPECTS

- 3.1.1 Curtis Instruments Inc. identifies actual or potential environmental aspects of its operations, activities, and services. Criteria and guidelines for identifying environmental aspects are provided in procedure *EnvOP-31-01 Environmental Aspects*.
- 3.1.2 A multidisciplinary team representing various departments and functions in the business unit identifies initial environmental aspects. The Environmental Representative coordinates this activity.
- 3.1.3 Environmental aspects are documented in the Environmental Aspect Log maintained by the Environmental Representative.
- 3.1.4 Environmental aspects are systematically evaluated for their significance using a disciplined and documented method. Evaluation criteria and method, and the final selection of significant aspects are documented.
- 3.1.5 A multidisciplinary team representing various departments and functions in the business unit evaluates the significance of initial environmental aspects. On an ongoing basis, evaluation of significance is carried out by the Environmental Representative and at least one other person familiar with the evaluated aspect.
- 3.1.6 Significance of environmental aspects is evaluated using a systematic risk analysis methodology. Aspects are rated with regard to the severity of associated impacts, probability of occurrence, and other relevant factors. The results are entered on the Environmental Aspect Evaluation Chart. The combined significance rating is calculated using a significance rating formula. The method is documented in procedure *EnvOP-31-02 Significant Environmental Aspects*.
- 3.1.7 Selected significant environmental aspects are reviewed and approved by the Executive Management, and are recorded in the Significant Environmental Aspect Master List.
- 3.1.8 On an ongoing basis, the Executive Management and departmental managers identify changes in activities, products, and services that create new environmental aspects, or invalidate previously identified aspects. New environmental aspects may also be identified through management review or by internal or external audits of the EMS. The

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changes are reported to the Environmental Representative who reviews and documents the new aspects.

3.2 LEGAL AND OTHER ENVIRONMENTAL REQUIREMENTS

3.2.1 Curtis Instruments Inc. identifies, and has access to legal, regulatory and other requirements to which the corporation subscribes. Methods and instructions for identifying those requirements are documented in procedure *EnvOP-32-01 Legal and Other Requirements*.

3.2.2 The process of identifying legal, regulatory and other requirements is developed in the following phases:

- Identification of current compliance programs, and preliminary research of activities and products that could potentially be subject to environmental regulations (using the survey checklist in procedure *EnvOP-32-01 Legal and Other Requirements*);
- Management review to determine whether in-house expertise and resources are sufficient to identify all applicable requirements;
- Initial identification and documentation of specific laws, regulations, and other requirements that apply to the facility;
- Ongoing identification of new or modified activities that could potentially be subject to environmental regulations; and ongoing review of new environmental regulations and changes in regulatory and other requirements that may apply to the facility.

3.2.3 Legal, regulatory, and other requirements are documented in Regulatory Requirements Matrix (refer to procedure *EnvOP-32-01 Legal and Other Requirements*).

3.3 OBJECTIVES, TARGETS AND PROGRAMS

3.3.1 Curtis Instruments, Inc. establishes environmental objectives and targets to fulfill the environmental policy and improve environmental performance in areas related to significant environmental aspects, legal and other requirements, and views of interested parties. Objectives are always maintained in areas pertaining to prevention of pollution.

3.3.2 A multidisciplinary team representing various departments and functions within each Curtis business unit recommends the selection of initial environmental objectives and targets. Criteria and guidelines for selecting environmental objectives are provided in procedure *EnvOP-33-01 Environmental Objectives and Targets*.

3.3.3 On an ongoing basis, the Environmental Representative identifies the need for new objectives and targets and recommends new objectives to the Executive Management.

3.3.4 Management programs are established and maintained for achieving environmental objectives and targets and continual improvement measures. The programs define the

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responsibilities, methods, means, and timeframe for achieving the objectives. Procedure *EnvOP-33-02 Environmental Management Programs* instructs on how to establish and implement the Environmental Management Programs.

- 3.3.5 The Environmental Representative initiates management programs and coordinates and supervises their implementation.
- 3.3.6 Corporate Management and other functions assigned with overall responsibility for specific objectives are responsible for defining and implementing relevant management programs, and for reporting on their status and progress.
- 3.3.7 Environmental objectives and targets and the corresponding Environmental Management Programs are documented in, and are monitored through OTMP (Objective and Target Management Program) specification sheets.
- 3.3.8 Objectives, targets, management programs, and other elements of the EMS are updated to ensure that they apply to new developments and to new or modified activities, products, and services.

4.1 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY

- 4.1.1 The executive management is ultimately responsible for the Environmental Management System (EMS), and for providing resources necessary to establish, implement, and maintain the system.
- 4.1.2 For the purpose of the EMS, the Executive Management is defined to comprise the following functions at the corporate level:
 - President
 - VP Sales
 - VP Manufacturing
 - VP Engineering
 - VP Quality Assurance
 - VP Human Resources
 - VP Finance
- 4.1.3 Curtis Instruments, Inc. appoints the VP of Quality Assurance as the Management Representative for the EMS. This appointee has the right to appoint Environmental Representatives at other Curtis business units that will deal with the EMS requirements at those sites. This function is referred to as the Environmental Representative. These Environmental Representatives, in conjunction with the local senior manager, will

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determine the top level management team that will participate within that facility in the development and implementation of the EMS. The Environmental Representative has the authority and responsibility to ensure that the EMS is established, implemented, and maintained in accordance with requirements of ISO 14001 and to report to the Executive Management on the performance of the EMS.

4.1.4 Interrelation of personnel who manage, perform, and verify activities comprising the EMS is defined in the organizational chart enclosed in this section.

4.1.5 All departments and functions in the corporation are responsible for implementing, maintaining, and supporting the EMS.

The following specific responsibilities are assigned:

President and Executive Management

- Formulates the environmental policy
- Provides resources necessary to maintain the EMS
- Reviews and approves significant environmental aspects, and environmental objectives and targets
- Conducts management reviews of the EMS

Engineering

- Identifies environmental aspects in designs (products and services)
- Evaluates and optimizes designs to reduce environmental impacts of the designed products and services.
- Provide EMS document control activities
- Coordinates EMS document control activities

Operations

- Identifies environmental aspects in production processes and related operations
- Optimizes production processes to minimize emissions, waste generation, and energy consumption
- Implements and maintains operational controls, including work instructions and training for activities associated with significant environmental aspects
- Implements management programs for achieving environmental objectives and targets

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- Manages and controls materials and wastes

Purchasing/Sourcing

- Specifies environmental requirements in purchase orders and contracts as applicable.
- Selects qualified suppliers and subcontractors who can meet environmental requirements
- Monitors and evaluates subcontractor performance with input to applicable departments

Facility and Equipment Maintenance

- Identifies environmental aspects in maintenance activities
- Optimizes maintenance processes to minimize waste generation and control disposal of waste
- Maintains the facility, equipment, and operational controls to ensure optimal performance with regard to significant environmental aspects

Marketing and Sales

- Conducts market research to anticipate customer expectations with regard to environmental aspects of products and services
- Establishes and includes specifications for environmental characteristics for new products in all Marketing Requirements Documents (MRD).
- Advertises and promotes the corporation's environmental initiatives and registration of the EMS

Human Resources

- Defines personnel qualification requirements for functions and positions associated with significant environmental aspects
- Implements measures to motivate personnel to improve their environmental performance and support the EMS
- Conducts corporation-wide environmental awareness training
- Develops and implements emergency preparedness and response plans

Environmental Representative

- Establishes, implements, and maintains the EMS
- Coordinates identification of environmental aspects, evaluation of significance of environmental aspects, and establishment of environmental objectives and targets

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- Coordinates establishment and implementation of management programs to achieve objectives and targets
- Identifies legal, regulatory, and other requirements
- Facilitates internal communication regarding environmental issues
- Communicates with external interested parties
- Identifies the need for operational control and coordinates their implementation and maintenance
- Monitors environmental performance with respect to significant environmental aspects and regulatory requirements
- Initiates corrective and preventive actions
- Coordinates maintenance of environmental records
- Audits implementation and effectiveness of the EMS
- Reports to the Executive Management on the performance and effectiveness of the EMS (management reviews)



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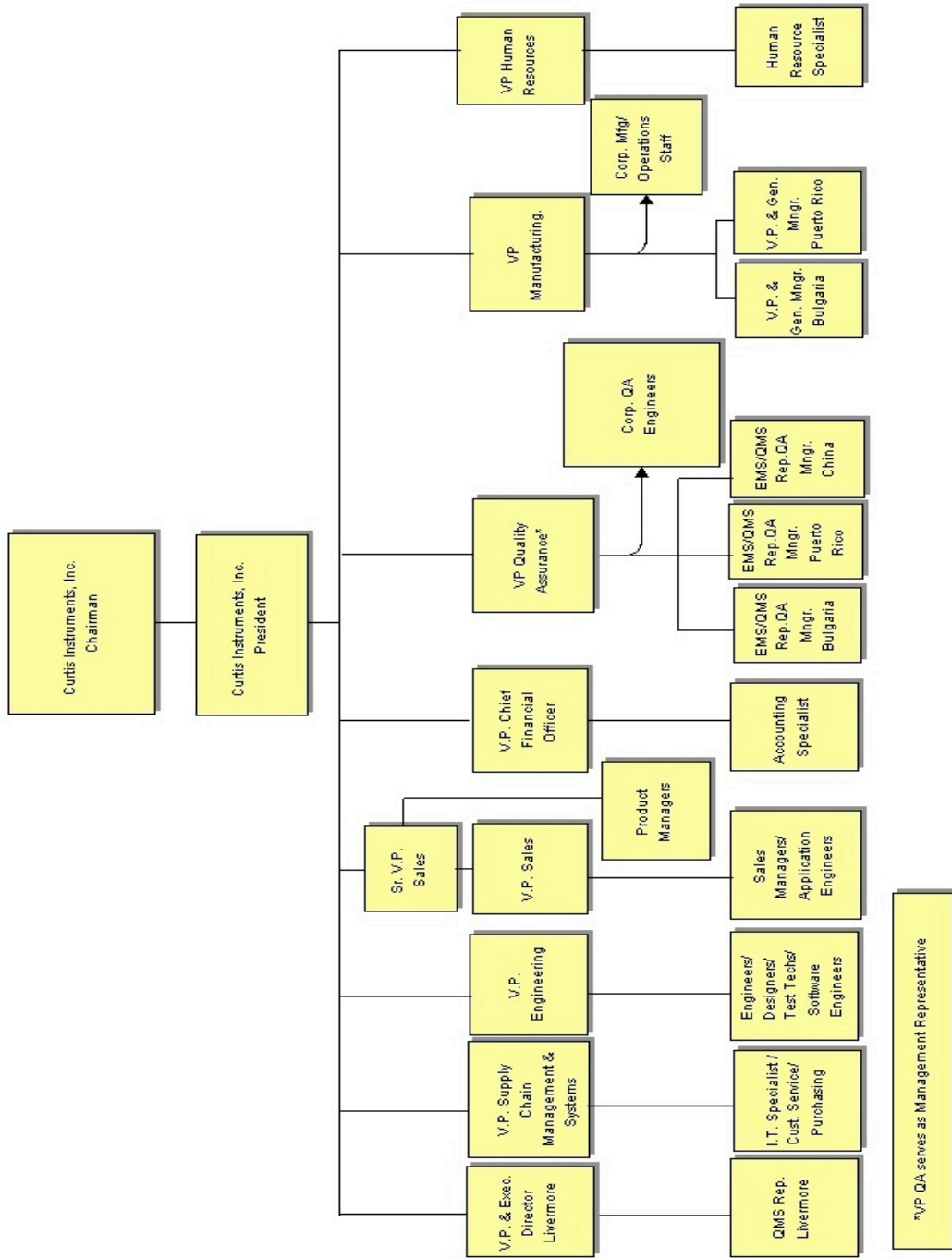
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Curtis Instruments' Organizational Chart



Note: Detailed site specific organizational charts are available through Human Resources at all Curtis business units.

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4.2 COMPETENCE, TRAINING AND AWARENESS

- 4.2.1 Curtis Instruments, Inc. identifies training needs and provides environmental awareness and EMS training to all personnel working for or on behalf of the corporation. Competence training is provided to personnel whose work may create a significant environmental impact. These activities are defined in Procedure *HOP-18-01, Training*.
- 4.2.2 The Environmental Awareness Program comprises EMS general orientation training; communication of environmental policy and other information about the EMS; distribution and instruction in the use of procedures and work instructions; and training in emergency response.
- 4.2.3 Environmental competence and skill training is provided for those groups of personnel whose work can cause a significant environmental impact.
- 4.2.4 Training programs are reviewed and amended to address new developments and changes, and in response to nonconformities identified through the system of corrective and preventive actions and internal audits of the EMS.
- 4.2.5 All EMS training is recorded (refer to Procedure *HOP-18-01*).

4.3 COMMUNICATION

4.3.1 Internal Communication

- 4.3.1.1 Curtis Instruments, Inc. maintains systems for communicating within the corporation, information about the EMS, environmental aspects and environmental issues. These systems are defined in Procedure *EnvOP-43-01 Internal Communication*.
- 4.3.1.2 Internal communication regarding the EMS flows two ways:

The management communicates to the corporation environmental aspects; the environmental policy, objectives, targets, and management programs; EMS procedures and work instructions; major events and achievements, and recognition of individual employees and groups.

The corporation communicates to the management information and data regarding new environmental aspects; status of environmental performance; progress in achieving objectives and targets; status of implementation and effectiveness of the EMS; specific concerns regarding the environment; and suggestions on how to improve the EMS and environmental performance.

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4.3.1.3 Information is communicated through distribution of EMS documentation, records and reports; training; and the Environmental Management System Web page on the Lunarinside.net Intranet site.

4.3.2 External Communication

4.3.2.1 Curtis Instruments, Inc. maintains a procedure for communicating with external interested parties, *EnvOP-43-02 External Communication*. This procedure instructs in receiving, documenting, and responding to relevant communication.

4.3.2.2 All incoming external communication regarding environmental issues is forwarded to the Environmental Representative and is recorded in the external communication log.

4.3.2.3 The Environmental Representative reviews the incoming communication and determines what other functions should be informed or involved, what response should be given to the originator (if any), and whether any internal actions should be considered to address issues raised in the communication.

4.3.2.4 The environmental policy is available to the public and is posted on the corporation's Internet site at WWW.Curtisinst.com and internal site Lunarinside.net.

4.4 DOCUMENTATION

4.4.1 The EMS is documented in the present manual, operational procedures, environmental guides, work instructions, and other related documentation. Procedure *QOP-05-02 (Documentation Control)* specifies how the EMS is documented.

4.4.2 Documents pertaining to the EMS comprise:

- EMS manual, operational procedures, and forms;
- Documentation defining significant environmental aspects, objectives and targets, legal and regulatory requirements, and management programs for reaching objectives and for monitoring environmental performance and compliance;
- Laws, regulations, standards, codes of practice, and other such documents defining applicable requirements;
- Training programs and materials;
- Emergency preparedness and response procedures;
- Work instructions, operational data sheets, and other written instructions for personnel whose work can create a significant environmental impact;
- Documentation defining equipment and other operational controls, and instructions for their use and maintenance.

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4.5 CONTROL OF DOCUMENTS

- 4.5.1 Curtis Instruments, Inc. controls all documents related to the EMS to ensure that they are reviewed and approved by authorized personnel; that current versions of documents are available where they are required; that obsolete documents are promptly removed; and to otherwise ensure integrity of documents. The document control system is defined in Procedure *QOP-05-02 Documentation Control*.
- 4.5.2 As applicable, documents are identified by their title, number, date of issue, revision level, and the issuing and approval authority.
- 4.5.3 Prior to issue and release, documents are reviewed for adequacy, correctness, and conformity with the environmental policy. Changes to documents are reviewed and approved by the same function or department that approved the initial document, unless designated otherwise.
- 4.5.4 Recipients of revised documents are instructed to remove and destroy the old, superseded version of the document. All documentation must be checked for latest revision before use. Maintaining unauthorized files with superseded revisions of controlled documents is prohibited.
- 4.5.5 Retained masters and copies of obsolete documents are stamped OBSOLETE and are kept separate from active documents.
- 4.5.6 Documents issued to personnel and outside parties who are not affected by the document, but need a copy for information only, are stamped UNCONTROLLED. Such documents are not followed up with revisions.
- 4.5.7 Documents of an external origin (i.e.) 14001 shall be provided to the business unit's document control manager who will maintain such documents. A log of documents indicating document title, number, and revision on file will be maintained.

4.6 OPERATIONAL CONTROL

4.6.1 Operational Control Methods, Systems, Processes, and Equipment

- 4.6.1.1 Special control measures are implemented to control operations and activities associated with significant environmental aspects. The system for ensuring operational control is defined in Procedure *EnvOP-46-01 Operational Control*.
- 4.6.1.2 Operational controls are methods, systems, processes, and equipment to safeguard the environment. This also includes operational criteria and procedures, work instructions, and inspection and preventive maintenance programs.
- 4.6.1.3 Work instructions are established where their absence could lead to deviation from environmental policy, objectives, or targets; or could cause significant environmental

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impact. Procedure EnvOP-46-01 stipulates specific criteria for determining where work instructions are required.

4.6.1.4 Inspection and/or maintenance programs are developed and implemented for equipment, machines and, systems associated with significant environmental aspects and emergency response programs.

4.6.1.5 Particular attention is paid to hazardous material and waste management. Related controls are defined in Procedure *EnvOP-46-03 Material and Waste Management*.

4.6.2 Purchasing

4.6.2.1 Curtis Instruments, Inc. communicates environmental requirements to its suppliers and subcontractors, and monitors their conformance with the requirements. Procedure *EnvOP-46-02 Purchasing and Subcontractor Control* defines these activities.

4.6.2.2 The following categories of purchased products and subcontracts are controlled by the EMS:

- Hazardous materials, substances, and chemicals; equipment for processing, storing and handling hazardous wastes; and hazardous waste haulers, treatment, and disposal facilities;
- Personal protective equipment, and equipment to be used for emergency response;
- Measuring and test equipment intended for monitoring environmental performance and regulatory compliance (including calibration);
- Subcontractors performing services at the facility who bring in hazardous materials or chemicals, or generate hazardous waste;
- Additional products and services that may be identified by the Environmental Representative because of their association with significant environmental aspects, objectives, or targets.

4.7 EMERGENCY PREPAREDNESS AND RESPONSE

4.7.1 Curtis Instruments, Inc. identifies potential accidents and emergency situations, and develops appropriate response plans for preventing and mitigating associated environmental impacts. The system for developing, testing, and implementing the plans is defined in Procedure *EnvOP-47-01 Emergency Preparedness and Response*.

4.7.2 The Environmental Representative identifies potential hazards that can cause accidents and emergency situations, to include hazardous materials and substances, dangerous activities, and potential hazards created by outside forces and natural disasters.

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- 4.7.3 Each potential hazard is evaluated to determine whether emergency response plans are warranted and, where relevant, appropriate emergency plans and procedures are developed.
- 4.7.4 Emergency preparedness and response procedures are documented. All personnel are made aware of the procedures and where they are located. Where practicable, emergency procedures are periodically tested.
- 4.7.5 The Environmental Representative is responsible for reviewing and, as necessary, revising emergency procedures after each occurrence of accidents and emergencies.

5.1 MONITORING AND MEASUREMENT

- 5.1.1 Curtis Instruments, Inc. monitors and measures performance of operations and activities that can cause a significant environmental impact. This monitoring and measuring system is documented in procedure *EnvOP-51-01 Significant Aspects Monitoring*.
- 5.1.2 For each monitored or measured characteristic, the Environmental Representative determines the measurement or test method, frequency, acceptance criteria, responsibility, and the manner for recording results.
- 5.1.3 When environmental performance falls below desirable level, or when there is a possibility of a noncompliance against laws or regulations, the Environmental Representative initiates corrective or preventive actions, or establishes appropriate objectives and targets to improve performance.
- 5.1.4 Measuring and test equipment used for verification of environmental performance is calibrated and properly controlled. Requirements for the control of measuring and test equipment are documented in procedure *COP-01-06 Measuring and Test Equipment Calibration*.

5.2 EVALUATION OF COMPLIANCE

- 5.2.1 Curtis Instruments, Inc. periodically evaluates its compliance with applicable legal requirements and with other requirements to which the corporation subscribes. The system for conducting these evaluations is defined in procedure *EnvOP-52-01 Evaluation of Compliance*.
- 5.2.2 The Environmental Representative is responsible for establishing the compliance monitoring program. For each relevant legal and/or other applicable requirement, the program determines the scope, method and frequency for the monitoring and measurement, as well as the acceptance criteria.
- 5.2.3 At least once a year, the Environmental Representative evaluates information and data generated by the compliance monitoring program and presents the results at the

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management review (refer to procedure *QOP-01-01 Management Review*).

5.3 NONCONFORMITY, CORRECTIVE AND PREVENTIVE ACTION

- 5.3.1 Curtis Instruments, Inc. maintains corrective and preventive action procedures for handling and investigating nonconformities, and for eliminating their causes or potential causes. These procedures are documented in *COP-01-07 Corrective Action and COP-01-08 Preventive Action*.
- 5.3.2 Corrective and preventive action requests (CARs) are initiated and implemented to address EMS nonconformities. Nonconformity is a deviation from a policy, procedure, standard, instruction, specification, legal or regulatory requirement; or from any other requirement which the corporation established, or to which it subscribes.
- 5.3.3 CARs assign the responsibility for handling and investigating the nonconformity, for mitigating any impacts caused and for implementing measures to prevent recurrence of the nonconformity.
- 5.3.4 CARs may be issued to internal departments of the business unit, as well as its suppliers and subcontractors.
- 5.3.5 Upon implementation of corrective or preventive action, CARs are followed up to verify that the action was indeed implemented and that it is effective.
- 5.3.6 CARs are initiated, documented, processed, and monitored using the caWeb Internal Issue Management System on the Web as documented in Procedure EnvOP-52-01 Evaluation of Compliance.

5.4 CONTROL OF RECORDS

- 5.4.1 Curtis Instruments, Inc. maintains environmental records to demonstrate conformance with legal, regulatory, and other requirements; and with requirements of ISO 14001. Procedure *QOP-16-01 Quality/Environmental Records* instructs in the establishing, storage, and retention of environmental records.
- 5.4.2 The following types of records are maintained:
- Aspect identification, and significance evaluation records
 - Objectives, targets, and management programs records
 - Subcontractor evaluation and monitoring records
 - Material and waste management records
 - Environmental performance monitoring records

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- Calibration certificates
- Operational controls and maintenance records

- Training records
- Emergency preparedness and response records
- Corrective and preventive action records
- External communication records
- Internal EMS audit reports
- Management review records

5.4.3 Storage locations and retention times for records are specified in procedure *QOP-16-01 Records and Retention*.

5.5 INTERNAL AUDIT

5.5.1 Curtis Instruments, Inc. periodically conducts internal audits of the EMS. The purpose of the audit is to verify whether the EMS conforms with stated requirements, including ISO 14001; and whether it is properly implemented and maintained. Internal audits are conducted in accordance with procedure *QOP-17-01 Internal Audits*.

5.5.2 All elements and activities of the EMS are audited at least once a year. The actual frequency depends on the status, importance, and past conformance history of the element of activity.

5.5.3 Internal audits are conducted in accordance with a documented internal audit plan established by the Environmental Representative.

5.5.4 Personnel assigned to carry out internal audits are appropriately trained and, if possible, are independent from those responsible for the audited activities.

5.5.5 Results of internal audits are reported using an Audit Nonconformity Report form. The form is used to document identified nonconformities and for initiating and processing related corrective actions.

5.5.6 Results of internal audits are reported to the top executive management and are discussed within the framework of management reviews.

6.1 MANAGEMENT REVIEW

6.1.1 The top executive management conducts periodical reviews of the EMS, in accordance with procedure *QOP-01-01 Management Review*.

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6.1.2 Management reviews evaluate environmental results and performance of the EMS, and consider changes to the environmental policy, objectives and other elements of the system. The purpose is to ensure continuing suitability, adequacy, and effectiveness of the EMS.

6.1.3 Management reviews of the EMS are conducted at least once a year. More frequent reviews are scheduled in the initial maturation phase of the EMS. At a minimum, management reviews consider:

- Results of internal audits;
- Results of evaluations of compliance with legal requirements and with other requirements to which the corporation subscribes;
- Complaints and other communication from external interested parties;
- The environmental performance;
- Status of objectives and targets;
- Status of corrective and preventive actions;
- Follow up actions from previous management reviews;
- Changing circumstances, including applicable requirements and environmental aspects and impacts; and
- Recommendations for improvement.

6.1.4 Results and conclusions of management reviews are documented.