ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

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UNCONTROLLED DOCUMENT
TABLE OF CONTENTS

1.0 PURPOSE ..............................................................................................................1
2.0 SCOPE ..................................................................................................................1
3.0 ISSUE AND UPDATE ..........................................................................................1
4.0 ENVIRONMENTAL POLICY ...............................................................................2
5.0 ENVIRONMENTAL ASPECTS ............................................................................2
6.0 LEGAL AND OTHER REQUIREMENTS .............................................................3
7.0 ENVIRONMENTAL OBJECTIVES AND TARGETS ............................................3
8.0 ENVIRONMENTAL MANAGEMENT PROGRAMS ............................................4
9.0 ORGANIZATIONAL STRUCTURE AND RESPONSIBILITY ................................4
10.0 TRAINING, AWARENESS AND COMPETENCE ............................................4
11.0 COMMUNICATION ............................................................................................5
12.0 ENVIRONMENTAL MANAGEMENT SYSTEM DOCUMENTATION ................5
13.0 DOCUMENT CONTROL .......................................................................................5
14.0 OPERATIONAL CONTROL ................................................................................6
15.0 EMERGENCY PREPAREDNESS AND RESPONSE .........................................6
16.0 MONITORING AND MEASUREMENT .............................................................7
17.0 NONCONFORMANCE AND CORRECTIVE AND PREVENTIVE ACTION ..........7
18.0 RECORDS ...........................................................................................................7
19.0 ENVIRONMENTAL MANAGEMENT SYSTEM AUDIT ....................................8
20.0 MANAGEMENT REVIEW .....................................................................................8
21.0 RECORD OF REVISIONS ....................................................................................9

APPENDICES

APPENDIX A ................. ASPECTS AND IMPACTS
APPENDIX B ................. ENVIRONMENTAL IMPACT RISK TABLES
APPENDIX C ................. LEGAL AND OTHER REQUIREMENTS
APPENDIX D ................. STRUCTURE AND RESPONSIBILITIES
APPENDIX E ................. TRAINING MATRIX
APPENDIX F ................. MASTER RECORDS LIST
1.0 Purpose

This manual defines the scope of the TECO-Westinghouse Motor Company's Environmental Management System (EMS) and provides a linkage of system documents to the various elements of the ISO 14001:2004 standard.

The principal elements of the system described in this manual are:
- Environmental Policy
- Environmental Aspects
- Legal and Other Requirements
- Environmental Objectives and Targets
- Environmental Management Programs
- Organizational Structure and Responsibility
- Training, Awareness and Competence
- Communication
- Document Control
- Operational Control
- Emergency Preparedness and Response
- Monitoring and Measurement
- Nonconformance and Corrective and Preventive Action
- Records
- Environmental Management System Audit
- Management Review

2.0 Scope

The TECO-Westinghouse Motor Company EMS provides a mechanism for environmental management throughout all areas and departments of the TECO-Westinghouse Motor Company’s Round Rock facility. The environmental management system is designed to cover environmental aspects which the facility can control and directly manage, and those it does not control or directly manage but can be expected to have an influence.

Reference Material
ISO 14001 Standard (4.1.3)

3.0 Issue and Update

The control of this Manual is in accordance with the TECO-Westinghouse Motor Company environmental procedure EP-016 Environmental Document Control. All copies of this Manual not marked "CONTROLLED DOCUMENT" are uncontrolled and should be used for reference purposes only.
4.0 Environmental Policy

The TECO-Westinghouse Motor Company Environmental Policy (Policy) is endorsed by the President. The policy covers all activities at the Round Rock facility. The Policy includes a commitment to continual improvement and prevention of pollution, as well as a commitment to meet or exceed relevant environmental legislation, regulations and other requirements. The Policy will be reviewed annually by top management, communicated to all employees and made available to the public in accordance with the Environmental Communication procedure.

TECO-Westinghouse Motor Company’s environmental policy is:

- **TECO-Westinghouse Motor Company (TWMC) will provide the necessary resources to establish, implement, maintain and continually improve an environmental management system committed to compliance with applicable environmental laws, regulations, policies, procedures and other adopted requirements. All TWMC executives, directors, managers, supervisors and employees are accountable and have a personal and corporate responsibility to ensure that this commitment is incorporated into daily activities and functions.**

- **We will work to improve our environmental performance by:**
  - Communicating our commitment to everyone working for or on behalf of TWMC;
  - Developing and periodically evaluating environmental objectives and targets that prevent pollution, minimize waste, improve service reliability and promote energy efficiency and cost savings.

Reference Material
ISO 14001 Standard (4.2)

Applicable Procedures
EP-009 Environmental Communication
EP-010 Contractor Control

5.0 Environmental Aspects

The TECO-Westinghouse Motor Company Environmental Cross Functional Team (ECFT) identifies the environmental aspects which the facility controls and which it may be expected to have an influence, and determines which of those aspects are considered significant. Discussions regarding significance are recorded in ECFT meeting minutes. These aspects are reviewed at least annually by the ECFT or when there is a new or changed process or activity at the facility. The Environmental Management Representative maintains ECFT minutes and other records. A list of environmental aspects and impacts are included in Appendix A – Aspects and Impacts. Appendix B displays the risk criteria used to identify significant aspects.
6.0 **Legal and Other Requirements**

The TECO-Westinghouse Motor Company has established an environmental procedure for the purpose of identifying, accessing and communicating legal and other requirements that are applicable to the facility. Additional information is also available through legal publications. Local regulations are identified, accessed and communicated by the Health, Safety and Environmental Office. At least annually the Health, Safety and Environmental Office will review the most current national, regional, provincial, state and local legal and other requirements as applicable to TECO-Westinghouse Motor Company. Please see Appendix C for a list of Legal and Other Requirements.

**Reference Materials**
- Appendix C (Legal and Other Requirements)
- ISO 14001 Standard (4.3.2)

**Applicable Procedures**
- EP-007 Environmental Regulations and Other Requirements

7.0 **Environmental Objectives and Targets**

The Environmental Cross Functional Team identifies and recommends objectives and targets from the environmental aspect and impact listing. The President and Executive management staff approve, modify and/or recommend other environmental objectives and targets. Objectives and targets are developed considering significant environmental aspects, legal/regulatory requirements, technological options and financial, operational and business plans, and the views of interested parties. These objectives and targets define:

1. The performance objectives for identified environmental aspects;
2. the specific, quantified targets which define those performance objectives; and
3. the planned deadlines for the achievement of those targets.

Each identified and approved objective and target area are assigned an Environmental Management Plan.
8.0 Environmental Management Programs

The Environmental Management Representative establishes environmental management programs (EMPs) as a means for achieving objectives and targets. These programs define the principal actions to be taken, those responsible for undertaking those actions and the scheduled times for their implementation. The EMPs are developed by the EMR based on the decisions and approvals of the President and Executive Management team.

Reference Material:
ISO 14001 Standard (4.3.3.2)

Applicable Procedures
EP-002 Environmental Aspects, Objectives and Targets, and Management Programs
EP-008 Environmental Review of Projects

9.0 Organizational Structure and Responsibility

Environmental management system roles, responsibilities and authorities are defined at relevant functions and levels within the organization. The President and Executive Management team jointly provides the resources essential to the implementation and control of the environmental management system, including: training, human resources, specialty services, financial resources, technical and informational services. The Environmental Management Representative has primary responsibility for establishing, operating and maintaining the EMS. The TECO-Westinghouse Motor Company Health, Safety and Environmental office is assigned the role of Environmental Management Representative. An Environmental Cross Functional Team provides EMS support and reports directly to the EMR as necessary. Documentation, which describes various positions, is included in Appendix D - Structure & Responsibilities.

Reference Material
ISO 14001 Standard (4.4.1)
10.0 Competence, Training and Awareness

TECO-Westinghouse Motor Company identifies, plans, monitors and records training needs for personnel whose work may create a significant impact upon the environment. TECO-Westinghouse Motor Company has an environmental procedure to train employees at each relevant function and level so they are aware of the environmental policy, significant environmental aspects, their roles and responsibilities in achieving conformance with the policy and procedures, and with the requirements of the environmental management system. Human Resources is responsible for maintaining employee training records. Appropriate records are monitored and reviewed on a scheduled basis. Competency is determined by the employee’s supervisor as specified in EP-014. An environmental training plan is in Appendix E - Training Matrix.

Reference Material
ISO 14001 Standard (4.4.2)

Applicable Procedures
EP-012 Environmental Training and Awareness

11.0 Communication

TECO-Westinghouse Motor Company has established and will maintain a procedure for internal and external communications regarding environmental aspects and the EMS.

Reference Material
ISO 14001 Standard (4.4.3)

Applicable Procedures
EP-009 Environmental Communication

12.0 Environmental Management System Documentation

This manual identifies all documents relevant to the EMS. A copy of EMS documents, other than visual aids and records, can be obtained from the Environmental Management Representative or designee. All current EMS documents will be maintained on the TWMC DocuShare software program.

Reference Material:
ISO 14001 Standard (4.4.4)
13.0 **Document Control**

TECO-Westinghouse Motor Company has established an environmental procedure for controlling all documents related to the environmental system. This procedure describes where documents can be located and how and when they are reviewed. The procedure ensures that current versions are available and that obsolete documents are promptly removed from use or are suitably identified. Controlled documents are obtainable from the Environmental Management Representative or designee. All current EMS documents will be maintained on the TWMC DocuShare software program.

**Reference Material**
ISO 14001 Standard (4.4.5)

**Applicable Procedures**
EP-001 Formatting Environmental Procedures, Work Practices & Forms
EP-011 Environmental Document Control

14.0 **Operational Control**

The Environmental Management Representative is responsible for identifying operations and activities associated with significant environmental aspects that require operational controls in procedures, work practices or environmental management programs.

These documents define the mechanisms for the establishment, implementation and maintenance of the EMS and ensure that the system is maintained in accordance with the environmental policy and objectives and targets and is communicated to on-site contractors.

- **Environmental Procedures**: Cover the management and control of both the EMS and the principal environmental aspects, which the system manages. These procedures are facility wide in their application.

- **Environmental Work Practices**: Cover the environmental control of specific operational activities and are usually activity specific in their application.

**Reference Material**
ISO 14001 Standard (4.4.6)
15.0 Emergency Preparedness and Response

TECO-Westinghouse Motor Company has an environmental procedure to identify the potential for and to respond to environmental accidents and emergency situations, and for preventing and mitigating the environmental impacts that may be associated with them. Emergency methods are reviewed by the Environmental Management Representative on an annual basis and after the occurrence of accidents or emergency situations.

Reference Material
ISO 14001 Standard (4.4.7)

Applicable Procedures
EP-006 Emergency Preparedness and Response

16.0 Monitoring and Measurement

TECO-Westinghouse Motor Company has established an environmental procedure to monitor and measure the key characteristics of its operations and activities that can have a significant impact on the environment. This procedure may include calibration and maintenance requirements and ensures that records will be retained.

TECO-Westinghouse Motor Company has established procedures to periodically review regulatory compliance and report results to management on a yearly basis.

Reference Material
ISO 14001 Standard (4.5.1, 4.5.2)

Applicable Procedures
EP-003 Environmental Management System Audits
EP-014 Monitoring and Measurement

17.0 Nonconformance and Corrective and Preventive Action

TECO-Westinghouse Motor Company has an environmental procedure for defining responsibility and authority for handling and investigating nonconformance, for taking action to mitigate impacts, and for initiating and completing corrective and preventive action. Any changes in procedures resulting from corrective and preventive actions are implemented and recorded. The Environmental Representative maintains these records.

Reference Material
ISO 14001 Standard (4.5.3)

Applicable Procedures
EP-004 Non-Conformance and Corrective and Preventive Action
18.0 Records

The TECO-Westinghouse Motor Company has an environmental procedure for the identification, maintenance and disposal of environmental records. These records include training records and the results of audits and reviews. They are readily retrievable and protected against damage, deterioration and loss. The Areas and Departments maintain their own environmental records. Record and document retention is also specified in the procedure. A list of relevant records is provided in Appendix F - Master Records List.

Reference Material
ISO 14001 Standard (4.5.4)

Applicable Procedures
EP-013 Environmental Records

19.0 Environmental Management System Audit

Periodic system audits are conducted to ensure that the environmental management system has been properly implemented and maintained. The results of these audits are provided to management. Audits are performed according to a schedule, which is based on the environmental importance of an activity, the results of previous audits and the audit schedule. All auditors are trained and audit records are kept with the Environmental Management Representative.

Reference Material
ISO 14001 Standard (4.5.5)

Applicable Procedures
EP-003 Environmental Management System Audits

20.0 Management Review

The President and Executive Management team reviews all elements of the EMS at least annually to ensure its continuing suitability, adequacy and effectiveness. Meeting minutes record these reviews and are kept by the Environmental Management Representative or designee.

Reference Material
ISO 14001 Standard (4.6)

Applicable Procedures
EP-005 Environmental Management System Management Review
21.0 Record of Revisions

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