

**Section Name:** CORPORATE POLICIES – OPERATIONS  
**Section No:** 4  
**Policy No:** 4.2

**Date:** 04/12  
**Supersedes:** 10/97

**Subject** ENVIRONMENTAL PROTECTION AND COMPLIANCE

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The Company will establish and maintain programs to ensure that the environmental laws and regulations applicable to its products and operations are effectively communicated, understood and complied with. The Company will implement its own policies even in the absence of local laws and regulations. The Company will evaluate and regularly review new and existing products and processes. The Company will strive to eliminate or minimize potentially adverse environmental impacts by effective design, process control, and waste minimization methods.

### **PROCEDURE**

1. Senior management bears the overall responsibility for implementing a program of environmental protection and compliance.
2. Unit managers shall ensure that plant managers and the site environmental health and safety officer understand and comply with all applicable environmental statutes, regulations, and policies and shall, at a minimum, establish and implement procedures to:
  - Supervise plants in their environmental compliance efforts
  - Promptly notify Corporate EHS of incidents with potentially significant environmental consequence
  - Designate an environmental, health and safety person for each site
  - Maintain a file of all environmental permits
  - Plan and budget for future compliance requirements
  - Ensure that all employees are made aware of and appropriately trained on the Company's environmental policies and procedures and provide appropriate resources and assistance in implementing them
  - Regularly inspect all facilities and operations
  - Seek counsel and assistance from Corporate EHS and the Law Department as appropriate
  - Monitor pertinent federal, state and local requirements
  - Adopt and implement specific procedures relating to hazardous materials release, detection, response, cleanup and reporting. (See EHS Policy 3.2.3.1, Response to Hazardous Materials Release.)
  - Adopt and implement specific procedures relating to hazardous materials storage. (See EHS Policy 3.2.4.1, Chemical and Waste Storage Facilities.)
3. Corporate EHS shall coordinate all Company environmental compliance functions and shall, at a minimum, establish and implement procedures to:
  - Provide support, training and regulatory interpretation
  - Formulate and communicate corporate environmental policies
  - Audit and report, at the direction of the General Counsel, the status of the Company's environmental compliance efforts

**Updates:**  
EHS

**References:**

Corporate Principle:

1.4, Environmental Protection, Health and Safety

Corporate EHS Audit and Inspection Guidelines

Corporate EHS Policy Manual

**Related Topics**

Section Name	Policy No	Subject
CORPORATE PRINCIPLES	1.4	Environmental Protection, Health and Safety