



Teledyne Technologies Incorporated

Environmental Management System Manual

Edition: November 2019

© Teledyne Technologies Incorporated 2002, 2019

Teledyne Technologies Incorporated

Environmental Management System Manual

EXECUTIVE SUMMARY

The purpose of the Environmental Management System (EMS) Manual is to set forth the key elements for incorporation into your facility's written EMS. The EMS to be developed and implemented, utilizing this Manual, is a set of written policies and procedures to guide the facility to achieve and maintain regulatory compliance through its environmental management practices. Each Teledyne facility is required to have a written EMS. Procedures exist to exempt certain facilities that do not impact the environment.

Note: Teledyne businesses and/or sites certified to ISO 14001 or equivalent Environmental Management System are in substantial compliance with the Teledyne EMS Manual requirements

The EMS is designed to be flexible to adapt to each facility. Prior versions of the facility's EMS may be updated for incorporation into this written EMS.

In general, the facility EMS is comprised of eleven (11) key elements as outlined in Section 1 of this Manual. Policies, procedures and informational tools, as well as assessment of operations for impacts to the environment, will be required. To the extent not already done, the facility and its management will also be required to:

- Create a written organization plan for environmental management (EMS Article IV, §2.1).
- Assign and communicate specific accountability and responsibilities for the facility EMS and compliance therewith and evaluate performance based on EMS and facility environmental compliance (EMS Article IV, §4.1).
- Take disciplinary actions for environmental violations (EMS Article IV, §3.2).
- Identify environmental requirements applicable to the facility and the ongoing process for assessing operations to maintain continual compliance with applicable requirements (EMS Article IV, §4.1).
- Implement management of change procedures and self-inspections procedures (EMS Article IV, §4.2).
- Implement procedures for identifying, reporting and correcting Environmental Incidents (EMS Article IV, §6).
- Implement awareness and training plan and record keeping requirements (EMS Article IV, §6).
- Implement environmental considerations in business planning (EMS Article IV, §7.1).
- Integrate environmental record keeping requirements (EMS Article IV, §8).
- Implement a Pollution Prevention Plan (EMS Article IV §9).
- Perform annual EMS compliance evaluations (EMS Article IV §10).
- Perform compliance reviews and audits in conjunction with Teledyne's environmental compliance program (EMS Article IV, §10.3).
- Certify annually to Senior Corporate Management that the Facility is in compliance with EMS and applicable laws (EMS Article IV, §10.4).

This Manual should be used in developing and implementing the facility EMS. Feel free to call the Corporate Environmental Management Team with any questions. Team membership and contact information is available on the Teledyne EHS Intranet page.

Teledyne Technologies Incorporated
Environmental Management System Manual
TABLE OF CONTENTS

Corporate Environmental Management Team

- I. Purpose and Scope
- II. Applicability
- III. Key Terms
- IV. EMS Program Elements
 - 1. Environmental Policy
 - 1.1 Environmental Objectives
 - 1.2 Policy Implementation
 - 1.3 Policy Communication
 - 2. Organization, Personnel and Oversight of EMS
 - 2.1 EMS Organization, Implementation and Maintenance
 - 2.2 Duties, Roles, Responsibility and Authority
 - 2.3 Communications
 - 3. Accountability and Responsibility
 - 3.1 Accountability and Responsibility
 - 3.2 Rewards and Penalties
 - 4. Environmental Requirements and Assessment, Prevention and Control
 - 4.1 Assessment of Regulatory Applicability
 - 4.2 Maintenance of Compliance Mechanisms
 - 5. Environmental Incident and Noncompliance Investigations
 - 5.1 Reporting
 - 5.2 Investigation and Corrective Action
 - 5.3 Action Follow-up and Verification
 - 5.4 Self-Testing of Environmental Incident and Non-compliance Investigation Procedures
 - 6. Environmental Training, Awareness and Competency
 - 6.1 Specific Education and Training
 - 6.2 Awareness
 - 6.3 Competency

7. Environmental Planning and Organization Decision-Making
 - 7.1 Environmental Planning
 - 7.2 Targets, Objectives and Action Plans
8. Maintenance of Records and Documentation
 - 8.1 Records
 - 8.2 Data Management
 - 8.3 Release of Information to Outside Parties
9. Pollution Prevention Program
10. Continuing Program Evaluation and Improvement
 - 10.1 Periodic EMS Evaluations
 - 10.2 Facility Compliance Evaluations for EMS
 - 10.3 Facility Compliance Evaluations
 - 10.4 Certification of Compliance
11. Public Involvement/Community Outreach
12. Other Topics
 - 12.1 Communications with Regulatory Agencies
 - 12.2 Procurement
 - 12.3 Real Property Acquisitions and Dispositions

Appendices

A – Assessment Documentation Guidelines

B – Management of Change (MOC) Trigger Guidelines

C – Environmental Incident and Noncompliance Investigation and
Corrective Action Procedure

D – Regulatory Inspection – Surprise or Scheduled

E – Attorney-Client Privilege and Attorney Work Product Privilege

F – Real Property

G – Environmental Reserves and Report

H – Form of Compliance Certification

I – Summary Description of Major U.S. Federal Environmental Statutes
and U.S. Federal Environmental Regulations Citations

Teledyne Technologies Incorporated
Environmental Management System Manual
CORPORATE ENVIRONMENTAL MANAGEMENT TEAM

Contact information for Corporate Environmental Management Team members is posted to the Teledyne EHS Intranet site (employee access only).

The Corporate Environmental Management Team is also known as the:

- Teledyne Environmental Management Team,
- Corporate Environmental, Health and Safety Management Team
- Teledyne Environmental, Health and Safety Management Team

Teledyne Technologies Incorporated

Environmental Management System Manual

I. Purpose and Scope

The purpose of the Environmental Management System (“EMS”) is to provide Teledyne’s Operating Segments and their designated Facilities with a framework to continue to maintain and operate in compliance with applicable federal, state and local environmental laws, regulations, permits and corporate policies (the “**EMS requirement**”). This Manual sets forth guidelines in establishing and implementing a written EMS for those Facilities required to develop and implement the EMS requirement (“**Facility EMS**”).

Each Facility General Manager has the primary responsibility to provide the appropriate resources for developing and implementing the written EMS consistent with this Manual.

The EMS applies to the full range of business activities that may impact the environment or be subject to environmental regulation. Health and safety considerations are intentionally not part of the Manual but are included in the Teledyne Health and Safety Management System Manual. Operating Segments and Facilities, if consistent with Operating Segment guidance, are free to incorporate health and safety elements into their EMS if they so choose.

At a minimum, each Facility's written EMS must contain the following elements, each of which is further explained herein:

1. Environmental Policy
2. Organization, Personnel, and Oversight of EMS
3. Accountability and Responsibility
4. Environmental Requirements Identification and Assessment, Prevention and Control
5. Environmental Incident and Noncompliance Investigations
6. Environmental Training, Awareness and Competency
7. Environmental Planning and Organization Decision-Making
8. Maintenance of Records and Documentation
9. Pollution Prevention Program
10. Continuing Program Evaluation and Improvement
11. Public Involvement/Community Outreach

The policies contained in this Manual intentionally are general in nature in order to afford the Operating Segments and their Facilities flexibility in developing a written EMS that will work effectively. As long as the policies articulated in this Manual are met, Operating Segments and their Facilities can develop a written EMS uniquely suited to the environmental requirements applicable to the activities at each location. A Facility’s written EMS may be a combination of related policies, procedures and practices or a single document. However, the connection between the management system elements must be clearly explained. All applicable aspects of the EMS must be in writing and must include an explanation of how each element meets the policies contained in this Manual.

This Manual refers to the following appendices, which contain related requirements and additional guidance

- A – Assessment Documentation Guidelines
- B – Management of Change (MOC) Trigger Guidelines
- C – Environmental Incident and Noncompliance Investigation and Corrective Action Procedure
- D – Regulatory Inspection – Surprise or Scheduled
- E – Attorney-Client Privilege and Attorney Work Product Privilege
- F – Real Property
- G – Environmental Reserves and Report
- H – Form of Compliance Certification
- I – Summary Description of Major Federal Environmental Statutes and Federal Environmental Regulations Citations

II. Applicability

This Manual applies to all Teledyne operations at which manufacturing operations or processes occur that impact, or have the potential to impact, the environment. In order for a Facility to be exempt from the EMS requirement, the Operating Segment Environmental Manager must certify to Senior Corporate Management that no manufacturing operations occur at the exempt Facility or that there are no environmental impacts, or the potential for impacts, at the exempt Facility. Facilities which are solely sales offices or administrative in nature are not intended to be covered by the EMS requirement.

III. Key Terms

Key terms used in this Manual and its Appendices have the following meanings:

- **Compliance Mechanism** – Procedure, practice, equipment, or operation controlling an aspect of environmental compliance.
- **Corporate Environmental Management Team** - A multi-disciplined Team, responsible for development and implementation of the EMS, composed of representatives from the Operating Segments, and corporate environmental, legal, auditing, engineering, and/or management. The Corporate Environmental Management Team is also known as the Teledyne Environmental Management Team, the Corporate Environmental, Health and Safety Management Team, and the Teledyne Environmental, Health and Safety Management Team.
- **Environmental Incident** – Anything that an Environmental Manager or Facility Environmental Management Team determines (with appropriate consultation with a TDY attorney) may not be in accordance with corporate policy, applicable procedures, federal, state, or local law or regulation in the environmental area. The characterization of an event as an Environmental Incident does not necessarily mean a violation of law has occurred. For purposes of this definition,

any notification received from a regulatory agency such as a notice to comply, notice of violation, etc., shall constitute an Environmental Incident. With respect to chemicals spills, incidental and minor spills and releases where the substances can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area or by maintenance personnel in compliance with the Safety Data Sheet (SDS) guidelines shall not constitute an Environmental Incident.

- **Environmental Observation** –An employee’s observation of a situation, condition, or event which he or she believes may not be in accordance with corporate policy, applicable procedures, or federal, state or local environmental law or regulations.
- **Facility** – A physical structure (or structures) supervised by one General Manager.
- **Facility Environmental Manager or Facility Environmental Management Team**
- The person or person(s) assigned the primary responsibility for environmental issues at a Facility.
- **General Manager** – The senior manager at a Facility.
- **MOC** – Management of Change – See Manual Appendix B.
- **On-Site Service Provider** – A subcontractor providing a service that affects Facility environmental compliance.
- **Operating Segment** – One or more Facilities of Teledyne set up as a separate organization for purposes of management control.
- **Senior Corporate Management** – The principal executive officers of Teledyne Technologies Incorporated, including its Chief Executive Officer, Chief Financial Officer, Controller and General Counsel.
- **TDY or Teledyne** - Teledyne Technologies Incorporated and its consolidated subsidiaries.

IV. EMS Program Elements

1. Environmental Policy

It is the policy of Teledyne to continue to maintain and operate our businesses in full compliance with applicable environmental laws, regulations, permits and our corporate Environmental Management System. It is also our policy promptly to evaluate and resolve any suspected instances of non-compliance. We recognize the importance of our environment and natural resources and encourage all our employees to embrace our responsibility to society when using and planning the use of natural resources. We shall take an active role in discovering and implementing means to prevent harm to our environment and to our natural resources by continuous improvement in our environmental performance. Teledyne is committed to providing adequate personnel and other resources to comply with applicable environmental laws, regulations and permits and implement, maintain and improve our Environmental Management System.

1.1. Environmental Objectives

In the conduct of its business this Operating Segment/Facility will seek to satisfy the following environmental objectives:

- 1.1.1. Comply with applicable environmental laws and regulations. Compliance is a minimum obligation, and, where economically and commercially feasible, compliance with more stringent voluntary standards should be achieved.
- 1.1.2. Make environmental issues (including staffing, budgets, recognition of liabilities, technological alternatives, etc.) a part of business operating and planning decisions.
- 1.1.3. Assign adequate personnel and other resources to environmental compliance.
- 1.1.4. Conserve and make efficient use of energy and natural resources, which are renewable, promote recycling and reuse of materials, and practice waste minimization.
- 1.1.5. Whenever commercially possible, develop and provide products or services that minimize environmental impacts and are environmentally responsible in their intended use.
- 1.1.6. Provide information to interested parties on the use, transportation, storage and disposal of products.
- 1.1.7. Develop and maintain adequate emergency preparedness plans in cooperation with community services and authorities.

- 1.1.8. Educate, train, and motivate our employees to conduct their activities in an environmentally safe and responsible manner.
- 1.2. Policy Implementation. Operating Segments/Facilities of TDY shall implement this policy through adoption and application of written policies, programs, and procedures developed for their particular circumstances.
- 1.3. Policy Communication. TDY, with the assistance of its Operating Segments/Facilities, shall communicate the environmental policy to all employees, as the efforts of all employees are required to support the policy. TDY also is committed to communicate this policy publicly, via its website or otherwise.

2. Organization, Personnel, and Oversight of EMS

2.1 EMS Organization, Implementation and Maintenance

Overall responsibility for the maintenance of these guidelines, and for monitoring Corporate EMS activities rests with the Corporate Environmental Management Team. This team is under the direction of the TDY General Counsel's office.

Overall responsibility for implementation and compliance with a Facility EMS rests with the senior operating executive and the General Manager of the Facility.

At the Facility level, each Teledyne entity must have a written organization plan for environmental management. Each Facility shall also prepare written policies and procedures that implement the objectives and mandates set forth in this Manual.

At a minimum, the environmental organization plan must identify the Facility Environmental Manager or Facility Environmental Management Team, and the Facility environmental contacts. The relationship between individuals with primary environmental responsibilities to the overall management structure at the Facility and Operating Segment must also be shown. The Environmental Manager, or a member of the Facility Environmental Management Team, must report directly to the Facility General Manager or have a clearly defined means of effectively communicating environmental issues to the Facility General Manager.

The Corporate office will maintain an organization chart that defines the structure and personnel of the TDY EMS.

2.2 Duties, Roles, Responsibilities and Authority

Either a Facility Environmental Manager or a Facility Environmental Management Team must directly or indirectly oversee the EMS at each Facility. The responsibility of the Facility Environmental Manager/Team is to administer the EMS Facility-wide. If a team approach is used, one member must be designated as

primarily accountable for team activities. The individual(s) who have the major responsibility for administering the EMS should possess demonstrated communication skills and an understanding of the underlying fundamentals of environmental issues and technology (See Competency, Article IV, §6). Though the Facility Environmental Manager (or the Facility Environmental Management Team) has overall responsibility for developing and implementing the EMS, such Manager or Team is not solely responsible for environmental compliance. The efforts of all employees are required in achieving and maintaining environmental compliance.

At minimum duties, roles, responsibilities, and authorities shall include the following tasks:

2.2.1. Corporate Environmental Management Team

- 2.2.1.1. Develop, implement and maintain a written EMS.
- 2.2.1.2. Verify each Facility has identified and dedicated adequate human and financial resources necessary for development, implementation and maintenance of the Facility EMS.
- 2.2.1.3. Verify each Facility has retained a competent individual(s) to act as the Facility Environmental Manager or Facility Environmental Team.
- 2.2.1.4. Verify that Facilities have implemented the appropriate polices, practices, procedures and activities to achieve and maintain compliance with the EMS.
- 2.2.1.5. Provide environmental guidance to Facility personnel responsible for EMS compliance.
- 2.2.1.6. Report to Senior Corporate Management on Facility compliance with EMS policies and procedures.
- 2.2.1.7. Report to the Audit Committee of the Board of Directors of TDY the results of audits conducted pursuant to Section 10.3.

2.2.2. Facility Environmental Manager or Environmental Management Team

- 2.2.2.1. Administer the Facility EMS.
- 2.2.2.2. Develop, review and/or approve Facility EMS policies, practices, and procedures.
- 2.2.2.3. Identify appropriate human and financial resources to implement and maintain the EMS.
- 2.2.2.4. Verify that the appropriate policies, practices, procedures and activities are in place to achieve and maintain compliance.

- 2.2.2.5. Provide direction and technical support to Facility personnel responsible for EMS compliance.
- 2.2.2.6. Communicate EMS related information to affected Facility employees.
- 2.2.2.7. Stay abreast of environmental regulations relevant to Facility operations.
- 2.2.2.8. Work with Facility personnel to develop and implement adequate and timely training programs for employees, contractors, and other third party consultants where appropriate.
- 2.2.2.9. Be accountable and responsible for the enforcement of EMS requirements.

2.2.3. Employees Who Have Environmental Responsibilities

- 2.2.3.1. Follow Facility EMS policies, practices and procedures.
- 2.2.3.2. Report to the Facility Environmental Manager or Facility Environmental Management Team all unsafe conditions, accidents, and exceptions to known EMS requirements.
- 2.2.3.3. Perform job in a compliant and environmentally safe manner.
- 2.2.3.4. Be responsible and held accountable for compliance with EMS requirements applicable to job.
- 2.2.3.5. Suggest improvements in the EMS and in environmental activities.

2.3. Communications

The Facility Environmental Manager or the Facility Environmental Management Team shall develop a plan to, or define effective mechanisms, that:

- 2.3.1 Advise senior Facility management and the Corporate Environmental Management Team of environmental issues and problems. (See Article IV, §5.)
- 2.3.2. Communicate specific instructions to employees with key EMS related responsibilities. (See Article IV, §3.)
- 2.3.3. Disseminate environmental information to specific departments or the general employee population. (See Article IV, §6.)
- 2.3.4. Communicate or flow down corporate environmental requirements to vendors, contractors, customers, or other third parties. (See Article IV, §3.)

- 2.3.5. Facilitate feedback from Facility personnel and external parties related to environmental deficiencies or concerns, and to respond to those concerns in a timely manner. (See Article IV, §5.)

Mechanisms to accomplish these objectives may include, but are not limited to, staff meeting presentations, training sessions, newsletters, e-mails, desk instructions, standard disclosures and disclaimers, and the like. Related guidance may be found in other elements of this Manual.

3. Accountability and Responsibility

3.1 Accountability and Responsibility

The TDY Chief Executive Officer is accountable and responsible for direction and control of the environmental performance of the corporation. In turn, each Operating Segment Senior Operating Executive and each General Manager is accountable and responsible for their operations. The assigned Environmental Manager or Facility Environmental Management Team is accountable and responsible for the operation of the Facility EMS. All employees are accountable and responsible for their actions. On-site service providers and contractors are accountable and responsible for their actions and compliance with the EMS as it applies to their respective contracted operations or services.

Specific accountability and responsibility must be assigned in the following areas:

- Developing environmental Compliance Mechanisms;
- Assuring that Compliance Mechanisms are properly operating;
- Appropriate reporting to regulatory agencies; and
- Follow-up on identified problems and corrective actions.

Assignments of accountability and responsibility should be documented. Such documentation can include organizational charts, job descriptions, or functional descriptions in Facility operating procedures. These assignments should also be communicated to all employees and on-site service providers and contractors to ensure that they are clearly understood.

Accountability shall be part of annual performance evaluations of applicable employees, including the Operating Segment senior operating executive, the General Manager and the assigned Environmental Manager or Facility Environmental Management Team.

3.2 Rewards and Penalties

Management and other employees with accountability and responsibility for a Facility EMS shall be evaluated, in part, for their environmental performance in their annual performance evaluations. Performance reviews for these employees must consider the status of annual objectives related to EMS compliance. Management and other employees shall be subject to disciplinary actions (including termination of employment) if they violate environmental regulations and procedures. Each Facility shall develop a disciplinary action plan. The plan shall identify categories of violations and the associated disciplinary action. Facilities may integrate this plan into existing disciplinary action plans or procedures.

Each on-site service provider and on-site contractor with accountability and responsibility for EMS compliance and environmental performance shall be evaluated for their environmental performance. Substandard performance will be grounds for dismissal or contract revocation. Performance shall be reviewed as necessary but at least during contract or purchase order renewal. Purchase Orders to service providers and contractors must not relieve them of their accountability for their actions and the enforcement provisions of laws and regulations that apply to their services or actions.

4. **Environmental Requirements and Assessment, Prevention and Control**

This section sets forth the steps to be taken by the Facility to identify (1) the regulatory requirements that are applicable to each Facility, and (2) the process for assessing operations and maintaining continual compliance with applicable regulatory requirements, including how to deal with changes to those operations and regulatory requirements. Appendix A contains a more detailed explanation of the process described at Section 4.1 below and includes mandatory documentation requirements. Accordingly, the provisions of Appendix A must be incorporated into each Facility EMS. Steps in this process include:

4.1 Assessment of Regulatory Applicability

- 4.1.1. Conduct an assessment of operations that includes a documented inventory of waste streams, regulated materials, and regulated processes;
- 4.1.2. Identify the laws and regulations applicable to the waste streams, materials and processes identified in §4.1.1 above;
- 4.1.3. Identify permits and other authorizations required for operation of the Facility;
- 4.1.4. Determine whether the Facility complies with applicable regulations and permits. The method of compliance must be identified.
- 4.1.5. Determine operations and activities that require written standard operating procedures (SOPs) to assure satisfactory control in preventing

unauthorized environmental releases or violations and develop such SOPs.

- 4.1.6 Develop procedures that (i) assign responsibility and accountability to appropriate Facility personnel for compliance with applicable environmental requirements and (ii) communicate applicable job responsibilities to Facility personnel. Procedures should also ensure that contractors or service providers who are identified as persons that are responsible for compliance must enter into appropriate written agreements that define those responsibilities in accordance with TDY's environmental policy and this Manual. See related guidance at Article IV, §12.2.

4.2 Maintenance of Compliance Mechanisms

Develop procedures to ensure (i) operations are compliant, (ii) changes to operations are compliant, (iii) knowledge of applicable regulations and changes thereto, and (iv) Compliance Mechanisms are operating as designed. These procedures include:

4.2.1 Management of Change (MOC)

Implement a practice that evaluates the environmental impacts of proposed changes in the following change categories:

- Raw Materials;
- Products;
- Processes;
- Facilities (including equipment and maintenance activities);
- Personnel;
- Corporate or Facility requirements; and
- Federal, state, and local regulations.

The objective of this element is the systematic and periodic review of those changes that have a potential environmental compliance impact. In the context of this EMS, MOC applies to changes, including temporary changes that occur at operating facilities. It requires the development of procedures and practices, which require appropriate evaluation of the environmental impacts of proposed changes prior to approving or implementing those changes. This objective should be accomplished by requiring environmental management review and written sign-off of all proposed changes satisfying one or more criteria (i.e. triggers) as outlined in Appendix B of this Manual. For more efficient resource use, MOC procedures should also address the discontinuation of processes, relaxation of regulations, and other changes that might imply that certain controls are no longer necessary.

The requirement to monitor changes in applicable local, state or federal regulations should be part of a general MOC overview process, and should also be the responsibility of the Facility Environmental Manager or Facility Environmental Management Team. The manager or team shall identify sources of regulatory update information and periodically review these sources for changes to applicable environmental requirements. Examples of regulatory update sources include, but are not limited to:

- Federal, state, and local web pages, mailing lists, newsletters, etc. for regulatory update information;
- Environmental training/regulatory update seminars;
- Regulatory update service providers (BNA, Enflex, etc.); and
- The Corporate Environmental Management Team.

Changes shall be made in the Facility EMS and in supporting procedures and Compliance Mechanisms if regulatory changes affect the system. Changes shall be communicated to the responsible person or team and to on-site contractors or service providers that are affected.

4.2.2 Self-Inspections

Self-inspections by line managers and trained personnel are to be conducted periodically on processes or operations where equipment malfunctions, equipment deterioration, operator error, or unplanned discharges or emissions could lead to:

- unauthorized releases of hazardous waste or pollutants to the environment;
- substantial endangerment of the environment;
- violations of environmental laws or regulations; or
- breach of contractual requirements (for example, a lease).

These required self-inspections are to verify operations are in compliance with environmental requirements. The frequency of inspections is to be scheduled appropriate to the risk and documented on an inspection log or other appropriate record. Related topics are also addressed at Article IV, §12 below.

5. Environmental Incident and Noncompliance Investigations

5.1 Reporting

Each Facility shall develop a procedure for the identification and reporting of potential violations and release incidents. Procedures should address both internal reporting and responsibilities related to any required disclosures to external regulatory agencies. There must be a problem reporting system that is initiated by the first observer of a problem and that defines the chain of incident reporting, i.e. the sequence of whom to notify and back-up personnel to contact when primary contacts are not available.

Guidelines for notification of Operating Segment management or the Corporate Legal Department representatives should also be incorporated in the procedures. The guidelines set forth in Appendix E (Attorney-Client Privilege) must be considered when developing notification procedures. The process must be integrated with emergency reporting procedures for incidents, which may require immediate response and/or reporting. If an immediate external notification is required, notification shall be made, and the Corporate Legal Department shall be promptly advised of the circumstances underlying the notification.

Notifications or communications on potential noncompliance areas that do not require immediate notification to a government agency, per regulatory requirements, shall be communicated to the Facility Environmental Manager or Facility Environmental Management Team and the Corporate Legal Department before contacting the government agency.

A sample procedure for the reporting of Environmental Incidents and follow up to those reports are included in Appendix C.

5.2 Investigation and Corrective Action

Each Facility shall develop a procedure for investigating and promptly addressing potential or actual regulatory violations related to environmental requirements. Potential violations may also be determined during Regulatory Agency inspections. Facilities should follow Appendix D guidelines if Agency inspections occur.

Once a situation is identified a root-cause analysis technique shall be used in investigations to help assure that corrective actions are taken on the correct cause. The practice may vary with the critical nature of the problem (i.e., from simple discussion and agreement up to formal problem analysis reports and action plans). Corrective actions must limit or prevent the future occurrence of the problem. Corrective action target dates should reflect the criticality of the problem and be evaluated for appropriateness along with the proposed actions. See Appendix C for a sample Investigation and Corrective Action Procedure.

5.3 Action Follow-up and Verification

Each Facility shall implement a follow-up system that will be used to verify that corrective and preventive actions were taken and were effective, and to ensure that the initiator of the finding is advised as to the disposition of the issue. This advisement may range from a simple follow-up visit by the environmental representative at some stated period after the scheduled corrective action to formal posting of investigation activities. Regardless of the system used, follow-up must ensure that delinquencies in the completion of corrective actions are identified, reported and addressed. See Appendix C for a sample Investigation and Corrective Action Procedure.

5.4 Self-Testing of Environmental Incident and Non-compliance Investigation Procedures.

These procedures shall be evaluated as outlined in Section 11.

6. **Environmental Training, Awareness and Competency**

6.1 Specific Education and Training

Each Operating Segment or Facility shall implement a written training plan that effectively provides basic environmental education, and continuing training, to enable employees to understand and fulfill the environmental responsibilities of their position. Education and training are a critical element of a strong and effective environmental management system. The objective of the education and training is to provide employees with the level of knowledge necessary for them to properly execute the environmental responsibilities of their job positions or assignments.

The training plan must identify the type, amount, and current status of required training for employees and/or categories of employees. Employees must receive a level of environmental training appropriate to their job responsibilities. Training needs satisfaction must be documented. Records of completed training shall be maintained.

Examples of required training include but are not limited to: hazardous waste worker training for hazardous waste generators and RCRA treatment/storage/disposal facilities; Department of Transportation general awareness, job specific, and hazardous material safety training for HazMat employees; and OSHA hazard communication training for employees who work with or are exposed to hazardous materials.

6.2 Awareness

Each Facility shall develop a written plan that describes the process for ensuring employees are aware of environmental policies and procedures, applicable environmental requirements, and their roles and responsibilities within the EMS. This

may include use of posters, supervisor discussions, meetings, written materials, videos, etc.

The Facility EMS should also address the process by which any employee can raise questions or concerns related to environmental matters and/or their responsibilities, and the method by which environmental management will respond to each such question or concern. While it should not be regarded as the first means by which an employee can raise questions or concerns related to environmental matters, employees should feel free to contact and not be dissuaded from contacting the Corporate Ethics Help Line (1-877-666-6968) with environmental issues or concerns.

6.3 Competency

Each Facility shall develop a process for ensuring personnel responsible for meeting and maintaining compliance with environmental requirements are competent. Competency determinations shall be based on education, training and experience. Competency determination may be performed by supervisor review and certification, testing or other means.

7. **Environmental Planning and Organization Decision-Making**

7.1 Environmental Planning

In conjunction with Article IV, Section 4.2.1 above on MOC procedures, the EMS must describe how environmental planning is integrated into the organizational decision making process for plans and programs such as: capital improvement plans, new product plans, product and process improvement plans, new process development plans, training and maintenance programs, etc. As a minimum, this should require environmental management review and approval of these types of activities when there is a clearly apparent or potential environmental impact or when specifically defined triggers (Appendix B) have been reached.

7.2 Targets, Objectives and Action Plans

In the event a Facility is in non-compliance with an environmental requirement, the Facility must establish targets, objectives, and action plans for achieving and maintaining compliance with the subject environmental requirement. The activities of on-site service providers and contractors must be included when applicable. Action plans must identify how progress towards targets and objectives are tracked and reported.

8. Maintenance of Records and Documentation

8.1 Records

The Facility EMS shall identify the minimum requirements for records and documentation. These records and documents shall include those required by regulation, by provisions elsewhere in this EMS, or those otherwise mandated by Operating Segment or Corporate Management. (Appendix G - Quarterly Environmental Reserves and Report - sets forth one set of required environmental reports required by the Corporate Legal Department.)

8.2 Data Management

The Facility shall develop a written data management system that provides for maintenance of required records and documentation. This system shall define, among other things:

- The individuals or groups who "own" the document (i.e. those who have the accountability for maintenance and update)
- The requirements for keeping logs and tracking records up-to-date. This includes, for example, the frequency with which waste-monitoring records should be updated.
- The control requirements for procedure and other reference document management. (A tie-in to other Facility document management or library systems should be considered.)
- Location of records and physical access controls.
- Record retention requirements (as described by regulation or Corporate directive).

8.3 Release of Information to Outside Parties

The Facility shall have written procedures related to release of records. These procedures should require that original records not be released outside of the control of the responsible person unless directed in writing. Copies should be provided instead of originals whenever possible. Neither copies nor originals shall be released outside of the Facility without Corporate, Legal Department and General Manager approval. Nothing in this requirement is intended to interfere with timely and cooperative disclosure of any data to governmental officials pursuant to a search warrant, subpoena, or other legal enforcement mechanism. (Additional discussions related to this topic are included at Appendix D regulatory inspections.)

9. Pollution Prevention Program

The Facility shall develop a Pollution Prevention Plan (“PPP”) that describes how that Facility will encourage the prevention, reduction, recycling, reuse, and minimization of waste and emissions. Procedures that encourage the substitution to environmentally preferable materials shall be included in the PPP. Proposed pollution prevention actions, including the use of substitute materials, shall be documented, tracked, and evaluated for efficacy by the Facility Environmental Manager or Facility Environmental Management Team. The PPP may be integrated into PPPs (e.g. waste minimization, source reduction, etc.) required by government agencies.

10. Continuing Program Evaluation and Improvement

10.1 Periodic EMS Evaluations

The Facility EMS shall require, at least annually, an evaluation of the EMS by appropriate personnel including the Facility Environmental Manager and/or Facility Environmental Management Team. This evaluation shall look for program improvement opportunities. Viable program improvement opportunities shall be incorporated into the Facility EMS (subject, as necessary, to review and approval by Operating Segment or Corporate senior management.) If needed, action plans for the change(s) shall be developed. These changes to the EMS shall be disseminated as required by Section 4 above. Action plans shall also be coordinated with and disseminated to affected personnel, including employees, on-site contractors, vendors and suppliers.

10.2 Facility Compliance Evaluations for EMS

Each Facility shall develop a program for periodic evaluation of Facility compliance with environmental requirements. Facilities may also consider using an audit program conducted by Corporate or Operating Segment environmental personnel as a supplement to the internal evaluation. (Reviews conducted by outside parties do not, however, eliminate the need for internal evaluations.) Results of internal evaluations or of audits shall be reported to the General Manager and the Operating Segment Environmental Manager/Corporate Environmental Management Team who shall include the data in their report to upper management. Required corrective actions should be established and monitored in accordance with requirements outlined at Article IV, Section 5 above.

10.3 Facility Compliance Evaluations

Each Facility shall participate in environmental compliance reviews and audits conducted by the Corporate Environmental Management Team pursuant to such scope and procedures set forth by Senior Corporate Management.

10.4 Certification of Compliance

Within thirty (30) days of the end of each fiscal year, the General Manager and Environmental Manager for each Facility subject to the EMS shall certify to the best of their knowledge, after due inquiry, that their Facility is in compliance with the requirements of EMS and applicable environmental laws. The form of certification to be submitted to Senior Corporate Management is attached as Appendix H to the EMS Manual.

In 2016, Teledyne published the Teledyne Health and Safety Management System (HSMS) Manual which required, among other things, an annual certification of compliance with the HSMS and applicable health and safety laws. In 2019, the environmental and health and safety certifications were combined into a single certification.

11. Public Involvement/Community Outreach

Each Facility EMS shall consider fostering ongoing community education and involvement in the environmental aspects of the Facility's operations. Generally, these efforts would be applicable to Facilities with operations that could have a significant environmental impact on the surrounding community, or when required by permit, regulation or as a legally mandated remedy pursuant to an Notice of Violation or other finding. Any such activities or programs must be coordinated with the Corporate Legal Department.

12. Other Topics

12.1 Communication with Regulatory Agencies

The Facility Environmental Manager or Facility Environmental Management Team should communicate with local/state environmental personnel and agencies on technical matters, environmental requirements, submittals of required data, etc., if appropriate.

12.2 Procurement

Outside vendors, consultants or other parties may be engaged to provide environmental related services. These include such things as waste disposal or treatment, installation and maintenance of control equipment, advice on EMS development and regulatory compliance, and remediation. Procedures should be implemented by the Facility to provide that:

- The party should be adequately evaluated for its ability to perform. This includes, but is not limited to, such steps as a review of financial fitness, technical capabilities, and time and resources available to service Facility needs. Due to the potential for long term liability, a site visit to waste

treatment, storage and disposal facilities may also be warranted before these entities are engaged.

- Any consultant engaged to perform environmental-related services normally performed by a Facility employee must be approved by the Corporate Environmental Management Team. Such services are generally defined as on-going EMS maintenance and include such things as development and implementation of environmental controls, waste stream identification, liaison with regulatory agencies, maintenance and renewal of licenses and permits, and development and tracking of corrective actions. This approval is to ensure that such consultants are engaged only when it is not technically or economically feasible to develop the required expertise in-house.
- Adequate contractual terms and conditions should govern the transaction. It is corporate policy that an attorney in the TDY Legal Department review such contracts.
- Though the Facility Environmental Manager or Facility Environmental Management Team will be closely involved in vendor selection, the engagement should be coordinated by the Facility purchasing or contracts department, or whatever department normally handles similar outside procurements. This is to ensure that the Facility adheres to various Corporate and Facility requirements related to negotiations, purchasing documentation, source selection, and the like.

12.3 Real Property Acquisitions and Dispositions

Attached as Appendix F hereto are guidelines to be used when considering the purchase or sale of any real estate. In addition, a Facility's management should consult the Corporate Legal Department in connection with such transactions.

Appendix A

Assessment Documentation Guidance

Section 4 of the EMS requires that each Facility assess periodically its operations, identify applicable regulations, permits and other requirements, determine whether they are in compliance, and develop Compliance Mechanisms in areas where they are lacking. This appendix provides instructions for completing this process. It also identifies mandatory documentation requirements, as well as suggested categories of additional documentation.

STEP 1 – Assessment of Operations

Each Facility shall assess its operations for compliance with applicable environmental laws and corporate or Facility procedures consistent with the objectives of this Manual. This assessment shall include a review of those operations and waste streams where equipment malfunctions, equipment deterioration, operator error, or unplanned discharges or emissions could lead to:

- unauthorized releases of hazardous waste or pollutants to the environment;
- substantial endangerment of the environment;
- violations of environmental laws or regulations; or
- breaches of contractual requirements (for example, a lease).

Minimum requirements for this assessment and supporting documentation are included in Sections 1.1 through 1.3 of this Appendix A.

1.1 Waste streams

Each Facility shall develop a profile for all waste streams. Waste streams include regulated and non-regulated air, liquid, and solid waste emissions. The profile shall include sufficient information to allow a regulatory applicability determination to be made. For each waste stream or emission source the following information must be identified and documented:

- Name of waste stream.
- Waste stream/regulatory status:
 - i. Federal hazardous waste
 - ii. Universal waste
 - iii. State hazardous waste
 - iv. Excluded waste stream, e.g. 40 CFR part 261.4 (a)
 - v. Solid non-hazardous waste
 - vi. Regulated air discharge
 - vii. Exempt air discharge
 - viii. Regulated wastewater discharge

- ix. Exempt wastewater discharge
 - x. Regulated storm water discharge
 - xi. Exempt storm water discharge
- Waste Stream Characteristics (include sufficient information to document your regulatory status determination made above in clause b).

For example, information regarding pH, flammability, metals content, etc. may be sufficient to properly characterize a solid waste; information regarding emission rates or type of pollutant may be sufficient to characterize an air emission as exempt; information regarding outdoor activity may be sufficient to characterize storm water as exempt.

- The waste disposal method (e.g. discharge to air, discharge to pollution control device, discharge to sewer, containerized and shipped off-site for disposal or recycling, disposed of on-site, etc.).
- The person responsible for maintaining waste stream profiles.

For ease of use and future maintenance, it is recommended that waste stream data be accumulated in an electronic database.

1.2 Regulated **Materials**

Each Facility shall develop and maintain a list of regulated materials. At a minimum, the list should identify the following types of information:

- Manufacture's name.
- Product name.
- Constituent chemical information including CAS number and fractional content expressed as percent by weight or volume.
- Maximum quantity on site at any given time during each calendar year for all hazardous chemicals regulated under EPCRA Sections 302, 311, & 312, i.e., 40 CFR Part 355 and 370 (EHS notification and Tier II Report), but only if maximum inventory quantity exceeds 50% of the regulatory reporting threshold. Note for California facilities - the inventory reporting thresholds for hazardous materials are 55 gallons, 500 lbs., or 200 cu. ft. for compressed gases.
- Annual site usage for all materials regulated under EPCRA Section 313, i.e., 40 CFR Part 372 (Form R report), but only if maximum annual usage exceeds 50% of the applicable reporting threshold.

- Identification of person(s) responsible for maintaining regulated material list. Reference may be made to Material Safety Data Sheet (MSDS) databases or abstracts, but the Facility-specific information must be included.

1.3 Regulated Equipment and Processes

Each Facility must develop a list of equipment and processes that are subject to environmental regulations, (e.g., pollution control equipment, halogenated solvent degreasers, refrigeration equipment, radiation-emitting equipment, waste water treatment systems, etc.) These lists should contain the following types of information:

- Name of equipment.
- Identification of authorized operators.
- Location of equipment.
- Person responsible for maintaining regulated equipment.

STEP 2 - Requirements Evaluation

This step requires facilities to identify systematically all applicable environmental requirements.

The environmental requirements that a Facility must meet are contained in: 1) the body of federal, state and local regulations; 2) the environmental permits in force; and 3) other requirements (e.g., Administrative Consent Orders, Unilateral Orders, investigation/remediation requirements, agreements with agencies). Additional requirements may arise from specific corporate or Facility procedures or practices. Appendix I provides a list of federal regulations that may affect TDY Facilities. Local and State regulations are not included in this list but must be included as part of the environmental requirements evaluation. Facilities located in the same state or county are encouraged to share acquired information, but the regulatory review must be specific to a Facility.

The Corporate Environmental Management Team utilizes a commercial software program to assist with environmental compliance evaluations. This tool will be made available upon request to each facility.

Questions regarding regulatory interpretation that cannot be answered by Facility personnel shall be directed to the Corporate Environmental Management Team. This includes situations where outside parties such as government officials, consultants, or training and seminar leaders provide guidance that may be at variance with current practice or contrary to other current regulatory interpretations. Examples would be advice that a permit currently in place was no longer required, or that compliance with a regulation could be waived. In all such situations, the concurrence of the Corporate Environmental Management Team must be obtained. This is particularly important in the case of verbal representations by regulators allowing deviations from requirements.

Where possible, the Facility should ask for written confirmation from the regulators. To avoid future misunderstandings, all such representations must be evaluated by the Corporate Environmental Management Team before any changes to existing compliance systems are implemented.

Once all applicable regulations are identified, electronic or hardcopy versions must be available at the facility. The actual documentation used will depend on the compliance assessment method developed pursuant to STEP 3 requirements below.

Permits:

Special documentation requirements exist for permits. Each Facility shall develop a list of all environmental related permits (e.g. air, water, industrial waste water discharge, National Pollutant Discharge Elimination System (NPDES), hazardous waste, storm water, hazardous material, radioactive material or equipment, boiler, pressure vessel, etc.) At a minimum, these lists should identify the following types of information:

- Permit name and description.
- Permit identification number.
- Issuing agency.
- Renewal or reapplication date.
- Expiration date.
- Identification of person responsible for maintaining/revising/updating/renewing permit.
- Location of permits.

Facility personnel may find that this process requires multiple iterations of STEPS 1 and 2. For example, the initial identification of regulated processes may have to be augmented if a review of the regulations indicates some applicability not previously recognized.

STEP 3 – Assessment of Facility Compliance

After determining the applicable requirements, the reviewer must identify a responsible person or team and identify a Compliance Mechanism for each requirement. This is to assure that each Facility meets its compliance requirements on a continuous basis. Contractors or service providers may also be identified as responsible persons. As required, the Facility shall develop new procedures or establish new Compliance Mechanisms. The detailed process essentially associates each identified requirement with related compliance information as follows:

The applicable regulatory provision, permit provision, or other requirement is listed. For each listed item the following information is developed and posted to the documentation:

- Is the Facility in compliance? To answer this “yes” or “no” requires an evaluation of existing controls and a determination whether those controls in place are adequate and operating as designed. Whenever a determination is made that the Facility may not be in compliance with a regulatory requirement, reporting should follow the processes outlined in Article IV, §5.1 of the EMS Manual.
- What is the method of compliance? In most cases, the documentation should reference some internal facility written procedure. Acceptable methods of compliance might also include calendars (to advise of required reporting due dates), training (job instructions and training in some rudimentary control environments might be a sufficient alternative to written procedures) and engineering controls (e.g. a mechanical valve that would shut off outflow if pH limit exceedances were detected). There may be other means of compliance identified, but each method must be evaluated sufficiently to determine that it is effective.
- Is a written procedure required? Each Facility shall review its assessment and determine those operations and activities that require written Standard Operating Procedures (SOPs). These procedures should be developed to reduce the risk of unauthorized environmental releases or regulatory violations. Subject operations could include, for example:
 - Complex operations;
 - Areas where backup or alternate personnel may not be fully cross-trained;
 - Areas with high turnover in personnel;
 - Areas requiring training;
 - Activities that require record keeping, monitoring, inspection, reporting etc.;
 - and
 - Activities that require equipment maintenance, testing, monitoring, etc., pursuant to regulatory or permit requirements.
- Who is responsible for compliance? The documentation should reflect either a person or entity that will be accountable for ensuring that the method of compliance is properly functioning. This should be a person or organization with sufficient cognizance of and “hands-on” proximity to the process.

To properly document this information, the Corporate Environmental Management Team suggests that a spreadsheet type matrix be developed that lists the requirement in the left column, with the other data posted to the right. Another practicable alternative is to make copies of actual regulations on wide paper, highlight the applicable sections, and, post the compliance information to the right. Any approach is acceptable that effectively captures the required information and is capable of being updated.

STEP 4 – Develop and Document Methods of Compliance

When the assessment indicates that the Facility is not in compliance with all applicable requirements, or when methods of compliance are not adequate to ensure continued compliance, those methods must be developed. This will necessitate task assignments, establishment of target completion dates, final reviews and other project management tools to ensure that the controls are successfully implemented.

As discussed in STEP 3 above, the method of compliance will often need to be documented in a written procedure. In addition to assignment of responsibilities, detailed instructions, and other standard contents, written procedures should also include provisions for self-inspections, peer reviews, or other techniques to ensure that the controls retain their effectiveness. For example, a requirement to prepare a log should also include a provision requiring a supervisor periodically to review for completeness the log.

Each Facility should also have a uniform process for documenting, reviewing, approving, releasing and maintaining written EMS related procedures. Environmental personnel must be included in the approval process if they are not directly involved in the preparation of the procedures. It is recommended that this process be integrated into any existing document control or library systems already in place.

STEP 5 - Communication and Training

Once methods of compliance have been developed, and supporting procedures written, they must be communicated to responsible employees. This should usually be accomplished by formal training, either in a group or one-on-one environment. Coincident with this training, employees should be made aware of the physical or on-line location of written procedures, and/or provided with those procedures. To be effective, training should also include some method, such as testing or other feedback, to ensure that the information is properly understood by the targeted employee or group. Generally, the posting of new information without targeting specific employees or groups, and without some feedback or acknowledgement, is not acceptable.

Contractors or service providers who are also identified as being responsible for compliance must enter into appropriate written agreements that define their responsibilities in accordance with TDY's environmental policy and the EMS Manual. See related guidance at Article IV, §12.2 of the EMS Manual.

ADDITIONAL MANDATORY DOCUMENTATION

To support the compliance process, maintenance of the following documentation is also mandatory.

Inspections and Monitoring Schedules

Each Facility shall develop a list of all environmental-related inspections, audits, reviews, surveys, tests, monitoring (emission or exposure), qualifying exams, medical tests, etc., that require initial and/or periodic performance. These lists shall identify the following types of information:

- Description of inspection, monitoring, review, etc.
- Regulatory citation or permit requirement.
- Frequency of inspection/monitoring/review, etc.
- Person responsible for conducting inspection/monitoring.
- Person responsible for notification or report submittal if inspection/monitoring/review, etc. requires reporting.
- Location of inspection/monitoring/ review, etc., records.
- A cross-reference to any control procedures related to inspection and monitoring.

Plans and Reports

Each Facility shall develop a list of all environmental related reports, plans, tax returns, notices, warnings, postings, etc. that require periodic submittal to government agencies, employees, the public, customers, vendors, contractors, or other interested parties.

Plans and reports that do not require initial or periodic submittal but must be maintained pursuant to regulatory or permit requirement (e.g. contingency plans, spill prevention control and countermeasure plans, storm water pollution prevention plans, source reduction evaluation review and plans, etc.) are also included in this category. These lists shall contain the following types of information:

- Plan or report description including regulatory citation.
- Frequency of submission or update.
- Due date or review date.
- Agency or person to whom the submittal is made.
- Employee responsible for report submittal or plan maintenance.
- Location of copies of submitted reports, records, and/or plans.

SUGGESTED ADDITIONAL DOCUMENTATION

Programs and Policies

Each Facility should consider developing a list of environmental related, programs, plans, policies, practices, procedures, manuals, guidebooks, etc., that are maintained by the Facility but are not otherwise required by regulatory or permit requirement. These lists might identify the following types of information:

- Document description.
- Employee responsible for maintaining/revising/updating the document (including reference to any configuration or library systems used to control issuance of the document).
- Location of the document.

Site Location Maps and Drawings

Site Location Maps

Each Facility should consider developing expanded site maps that indicate by location the following types of physical features:

- Floor drains.
- Smokestacks and air emission points.
- Wastewater treatment facilities.
- Hazardous and non-hazardous waste storage locations, including satellite storage and waste hauler pickup points.
- Municipal sewer lines.
- Bag houses, scrubbers, or other pollution control equipment.
- Processes with significant hazardous material use (e.g. plating, degreasing).

Drawings

Each Facility should consider developing drawings that illustrate the following information:

- Process flow diagrams.
- Piping and instrumentation diagrams (P&ID) for wastewater treatment facilities.
- Sanitary plumbing diagrams
- Industrial waste plumbing diagrams

Appendix B

Management of Change (MOC) Triggers Guidelines

Examples of change criteria (i.e., MOC triggers) that trigger environmental reviews include, but are not limited to, the following.

1. Raw Materials

- Request for a new material;
- Request for a new use for an existing material;
- Significant change in the quantity used of an existing material;
- Materials that are purchased or received free as samples or for use on a trial basis, or used by an outside contractor, or materials bought on one-time basis; or
- Deletion of a material from inventory.

2. Products

- The addition or deletion of a product line; or
- A change in the customer's end use of a product.

3. Processes

- Request for addition, deletion or change to an existing process including changes to operating parameters (e.g. ranges of temperatures, pressure, hours of operation, etc.);
- Request for a new use of an existing material or an equipment; or
- Waste stream emission flow rates or character.

4. Facilities (including equipment and maintenance activities)

Changes that will add, delete, relocate or modify any of the following:

- Drains, stacks, or vents;
- Hoods or ventilators;
- Regulated Equipment;
- Furnaces;
- Monitoring equipment;
- Hazardous material storage; or
- Pollution control equipment.

4. Personnel

- New hires;
- Termination of an employee; or
- Transfer of an employee from/to a different position.

6. Corporate or Operating Segment Requirements

- Issuance of a new policy or procedure; or
- Deletion of an existing policy or procedure.

7. Federal, State, and Local Regulations

- Deletion, issuance, or changes to applicable federal, state, or local regulations.

8. Permits

- Application or receipt of any new or modified permit.

It is recommended that facilities identify existing change documents (e.g. engineering change orders and directives, purchase requisitions, bid decisions and proposals, design documents, Facility work orders, maintenance requests, employee transfer requests, new employee requisition forms, etc.) and incorporate environmental review into the change approval process. For example, a Facility work order could have a check box to indicate that an environmental review was performed, and the requested work has received the Facility Environmental Manager or Team's approval.

Appendix C

Environmental Incident and Noncompliance Investigation and Corrective Action Procedure

NOTE: This sample procedure should be used only as a model. Each Operating Segment or Facility must modify it appropriately to correspond to position titles, and other organizational elements unique to the Facility. One key objective is that there are no delays in reporting an incident. This applies to internal reporting, as well as any type of reporting to regulatory agencies. Another key objective is that corrective actions are initiated, their implementation monitored, and their effectiveness verified.

TELEDYNE OPERATING SEGMENT/FACILITY

Environmental Incident Reporting

Purpose:

This practice describes the internal and external Environmental Incident reporting procedure used at (*insert name of Teledyne Facility*). Environmental Incidents are defined in section III of the EMS.

Legal Privilege:

Where applicable reporting of Environmental Incidents shall be conducted in accordance with Appendix E – Attorney Client Privilege.

References:

Teledyne Environmental Management System Manual, November 2019.

Forms Used:

Environmental Incident Report, shown as Figure 1.

Practice:

Employees must report all Environmental Incidents they observe to the Facility Environmental Manager, or member of the Facility Environmental Management Team. If none of these employees are available, the incident must be reported to senior management at the Facility. Initial contact must be made orally. This is to avoid the risk that critical situations are not addressed due to unanswered e-mail or voice-mail messages, or due to submitted hardcopy reports being overlooked.

Environmental Observations may be reported to the Facility Environmental Manager or Facility Environmental Management Team, however, corporate reporting is not required. Environmental Observations are defined in Article III of the EMS Manual.

In situations where there is no present or incipient risk to employee, public, or environmental welfare (such as when the concern relates to the performance of a specific employee, to aspects of general Facility Operating Segment or Corporate policy, or the like), the report may be submitted anonymously. This should be done only in rare cases, as it inhibits the ability to thoroughly investigate allegations, and to "close the loop" with employees who voice concerns. Likewise, an employee request to handle a report or discussion anonymously after the report is made, or the discussion occurs, will be considered, but legal necessities may preclude honoring such requests.

After reporting the Environmental Incident, the observer may be requested to complete the Environmental Incident Report (see Figure 1) or this form may be completed by the Environmental Manager. In either case, it will be the responsibility of the Environmental Manager to ensure that the form has been properly completed.

All Environmental Incidents must be reported to senior Operating Segment management and the Corporate Legal Department. It is the responsibility of Facility environmental management to make this report. It will be the responsibility of the Facility environmental management working with the Corporate Legal Department, to determine if regulatory entities must be contacted. In all cases, the Facility Environmental Manager or a specially-designated member of the Facility Environmental Management Team will maintain an Environmental Incident log.

The decision to report immediately an issue to a regulatory entity, before consultation with senior management and the Corporate Legal Department, is at the discretion of the Environmental Manager, if the event is of sufficient severity to require immediate regulatory agency notification. In all cases, however, the Environmental Manager will maintain an Environmental Incident log.

Department supervisors, or others directly responsible for operations where spills or releases may require agency notification will be trained in recognizing these types of events and are directed to contact either Facility or Operating Segment management or the Corporate Legal Department in the case that Facility environmental management is unreachable. Unless directed otherwise by Corporate Legal Department, the incident should be addressed by the Environmental Manager and/or Facility Environmental Management Team as follows:

1. Investigate the incident.
2. Determine root causes.
3. Assess the potential severity.

4. Working with the appropriate line and support personnel to develop the needed preventive or corrective actions.
5. Document decisions, actions, and accomplishments on the Environmental Incident Report form (see Figure 1) or in report-referenced attachments.

After appropriate corrective actions have been determined, the Facility and/or Operating Segment Environmental Manager must report the disposition of the matter to the employee who originally reported the incident. This report must, at a minimum, be in writing. Scope of the response to the employee may be restricted by the Corporate Legal Department in certain cases.

The Facility Environmental Manager or a specially designated member of the Facility Environmental Management Team will also be responsible for the completion and retention of all incident reporting documentation and will be accountable for any follow-up to ensure that corrective actions are in place and operating. This follow-up must occur as soon as possible after the completion of the corrective actions and must be documented. The Facility Environmental Manager or a specially designated member of the Facility Environmental Management Team will also be responsible for reporting any defects in the implementation of the corrective actions to appropriate Facility and/or Operating Segment management until all items are properly resolved.

Figure 1
Environmental Incident Reporting Form

Report Number: _____

Report Date: _____

Facility Name: _____

Facility Address: _____

Environmental Incident Observed By: _____

Observer's Phone Number: _____

Description of Incident: (report only the facts. Do not engage in speculation or hyperbole.)

- Where did the incident occur?
- Who was involved?
- What happened?
- When did it happen?

Investigative and Corrective Actions: (define the cause of the incident and identify the corrective measures implemented to prevent future occurrence)

- The incident was caused by: _____
- The corrective measures to prevent future occurrence are: _____

- Corrective Action Assigned to: _____

- Date: _____

Resolution:

- Issue resolved: _____
(signed) Environmental Manager
- Date: _____

Appendix D

Regulatory Inspection – Surprise or Scheduled

1. Introduction

When representatives of an environmental regulatory agency arrive at your Facility to conduct an unanticipated inspection or audit of the Facility's production processes and waste management practices or to investigate a death, serious injury or environmental mishap, you need a responsive plan of action. This Appendix sets forth a model response plan.

In general, most major federal environmental laws specifically provide federal inspectors the authority to enter facilities, review records and collect samples. State, county or city laws and regulations similarly authorize inspections by state and local inspectors.

The bywords in any inspection are "COOPERATION" and "BE POLITE." If Facility personnel attempt to deny access to an inspector or allow a visit to become adversarial or antagonistic causing the inspectors to leave the site, the inspection may continue later under authority of a search warrant. If Facility personnel are adversarial or evasive, the inspectors' curiosity will be aroused. As a result, the inspectors may spend more time at the Facility, investigate Facility operations more closely, and be more likely to issue a violation for marginal non-compliance. A cooperative working relationship between the inspectors and Facility personnel will simplify any investigation and contribute to development of a positive working relationship.

2. Death, Serious Injury or Serious Environmental Mishap

It is important to note that, in the case of potential criminal liability, while maintaining a cooperative attitude, you are not required to respond to questions without the advice of counsel. Therefore, it is imperative that, **IN THE CASE OF DEATH, SERIOUS INJURY OR SERIOUS ENVIRONMENTAL MISHAP**, you notify the Corporate Legal Department immediately. **You should request that counsel be present, and Counsel should be present during the inspection.**

It is TDY's policy to cooperate with regulatory and law enforcement authorities in the course of investigations. However, in situations involving potential criminal liability, individuals have Constitutional rights and TDY in no way intends for its cooperation to interfere with the rights of its employees.

If an employee is contacted at home or at work by federal, state, provincial, local, etc. law enforcement agents, (either domestic or international), the employee has the right (1) to choose whether he or she wishes to be interviewed, (2) to request at any time that the interview be terminated, (3) to request that the interview be held at a different time or location. The employee also has the right to consult with either Corporate Legal Department attorney or his or her own attorney before an interview and may insist that an attorney be present during any interview. In all cases, the agent must honor the employee's

request. If an employee is interviewed, the employee must tell the truth to the best of his or her recollection.

If agents are seeking to execute a properly issued search warrant, the Facility and its employees must furnish the materials requested in the search warrant. The Corporate Legal Department should be contacted, and counsel should be present.

3. Model Response Plan for Regulatory Inspection

This section sets forth a model for a responsive plan of action. Note that this model approach works equally well for scheduled or surprise inspections. The model can be customized for a Facility's individual circumstance. However, any customized response plan should be discussed with the Corporate Legal Department prior to its implementation.

3.1 Inspection Response Team. Each Facility should designate an Inspection Response Team ("IRT") to respond to surprise or scheduled inspections at the Facility. The IRT should consist of at least two supervisory level employees familiar with the Facility's production processes and waste management practices. When responding to an inspection, the IRT members should each have in their possession the following items:

- A note pad;
- A hand-held tape recorder;
- A camera with flash attachment; and
- A solid/liquid material sample collection kit.

3.2 Signing In. The Facility's security guard or receptionist should have each regulatory agency inspector present his or her credentials and sign the visitors' log with his or her full name, title, date of arrival and time of arrival. In the event the Facility has national security information, or is otherwise restricted or classified for security purposes, the investigator should be required to provide proof of appropriate security clearance before being allowed to enter restricted or classified areas. During the sign-in, the guard or receptionist should alert the IRT. The guard or receptionist should advise the inspectors that appropriate Facility representatives will meet them at the gate (or in the lobby) momentarily.

3.3 Meeting the Inspectors. The IRT should greet the inspectors at the gate (or in the lobby). Upon greeting the inspectors, the IRT should politely ask:

- What the purpose of the inspection is;
- What the authority for the inspection is;
- What the Facility's rights are;
- Whether the Facility or any employee at the Facility should have Corporate Legal Counsel present;
- What portions of the Facility they would like to visit;

- Whether they intend to take photographs, collect samples, copy documents and/or interview employees;
- Whether the IRT may have "splits" of any samples collected by the inspectors; and
- **IN THE CASE OF DEATH, SERIOUS INJURY OR SERIOUS ENVIRONMENTAL MISHAP**, whether they will delay the commencement of the inspection for a reasonable time to allow for the arrival of the Facility's Corporate or retained legal counsel.

Preferably, the IRT will tape record these questions and answers. At a minimum, the IRT will take extensive notes.

- 3.4 Press and Media Inquiries. The IRT will politely refuse access to any media representatives who wish to accompany the inspectors and, at the first opportunity, should advise the Corporate Media Contact of the situation. All requests for information from the media should be referred to the Corporate Media Contact.
- 3.5 Keeping Together. As the inspection begins, the IRT will ask the inspectors to stay together. If the inspectors do so, one member of the IRT will lead the inspectors through the requested portions of the Facility, while the other IRT member notifies the Corporate Legal Department. If the inspectors refuse to stay together, the IRT should temporarily delay notifying counsel until additional properly equipped Facility personnel can be located to accompany each independent inspector or group of inspectors.
- 3.6. During the Inspection. During the course of the inspection, the IRT should ask to tape record all conversations involving the inspectors – or, at a minimum, take extensive notes. Only the most innocuous questions should be answered on the spot. All other questions should be deferred until the end of the inspection visit so that answers may be discussed in advance with an attorney in the TDY Legal Department. During the course of the inspection, the IRT should:
- Photograph everything photographed by the inspectors;
 - Duplicate sample everything sampled by the inspectors;
 - Duplicate copy every document copied by the inspectors; and
 - Make careful notes concerning those portions of the Facility seen by the inspectors
- 3.7 Documents. The IRT should number all documents reviewed by the inspectors. **Attorney-Client privileged documents should never be produced under any circumstances.** (See Appendix E for a discussion of the Attorney-Client Privilege.) The IRT should refuse to produce any arguable privileged document to the inspectors until that document has first been reviewed by counsel. In addition, trade secret documents should not be produced unless and until counsel has negotiated an

appropriate protective agreement with the inspectors.

- 3.8 Employee Interviews. An IRT member should be present whenever an inspector interviews any Facility employee. If, for any reason, this is not possible, an IRT member should de-brief interviewed Facility employees immediately after completion of the inspection.
- 3.9 Signing Out. Upon the conclusion of the inspection, the IRT should accompany the inspector to the gate or lobby where they entered the Facility. The IRT should ask the inspectors:
- What they found during the inspection?
 - What significance they attach to their findings?
 - What plan of action they intend to pursue?
 - What laboratory they are taking any solid or liquid samples to for analysis?
 - Whether they would give the IRT a copy of their inspection notes?
 - Whether they would send the IRT a copy of the laboratory analysis report and/or their final inspection report?
 - The IRT should then have the inspectors sign out at the visitors' log.
- 3.10 After the Inspection. Following the inspection, the IRT should immediately review the inspection with counsel. The IRT should follow counsel's advice concerning the separate storage and preservation of the notes, photographs, samples and tapes generated during the inspection.

4. Checklist for Regulatory Inspections

4.1 Before the Inspection

- Be polite at all times;
- Have the inspectors present their credentials, and sign-in;
- Ask what the authority for the inspection is;
- Ask what the purpose of the inspection is; and
- **IN THE CASE OF DEATH, SERIOUS INJURY OR SERIOUS ENVIRONMENTAL MISHAP**, notify the Corporate Legal Department immediately. In-house or retained counsel should be present during the visit.

4.2 During the Inspection

- The IRT should make every effort possible to have at least two people accompany the inspectors at all times – one to act as scribe-recording all questions asked and all responses. If the inspectors are interviewing an employee, have an attorney or an Operating Segment representative present. Alternatively, interview the employee after the government inspector is done with the employee, including any people previously interviewed prior to the inspections (e.g., at their homes after working hours);
- Check documents for attorney-client privileged communications and for trade secrets/business confidentiality;
- Number every document the inspectors review;
- Be cooperative and polite but know that you do not have to say anything;
- If the inspectors ask you questions you can refer them to the relevant documents and ask that they hold their questions until the end of the day;
- It is best not to answer any "why" questions:
 - Ask the inspectors to submit those in writing; or
 - Ask them to save any "why" questions to be asked at the end of the inspections. Record all "why" questions and discuss answers with counsel before responding, if possible.

4.3 Before the Inspectors Leave

- Ask the inspectors for all split samples, photos, copies of notes and other materials generated during the inspection;
- Ask for a copy of any reports they are preparing for internal or external use and a copy of any data, lab results, etc.; and
- Try to get as much information from them as possible to identify areas of potential violation.

4.4 After the Inspectors Leave

- Immediately review the inspection with counsel;
- Follow information retention guidelines given to you by counsel.

Appendix E

Attorney-Client Privilege and Attorney Work Product Privilege

Confidentiality

The need for confidentiality when working in the environmental area is paramount. Obviously, there are many things, which must be written down in order to do your job. But, every effort should be made to communicate information verbally where possible and avoid committing to writing unnecessary or sensitive information regarding your Facility and its operation. When you must write information, limit your writing to facts. Avoid transmitting unnecessary or sensitive written information to outside consultants. If, after consultation with the Corporate Legal Department, it is determined that such information must be transmitted to a consultant, oral communications with consultants are preferable. In many environmental matters, you will want to have counsel retain outside consultants.

If you become aware of adverse information, do not discuss the information with personnel at your Facility. Take any necessary emergency action to prevent harm to employees, the public, or the environment, then immediately call the Corporate Legal Department and discuss the information with an attorney. Your communication with counsel, if conducted properly, will protect the communication from disclosure in any adversarial situation. As discussed in greater detail below, the attorney-client privilege and the attorney work product doctrine are useful in protecting you and the people for whom or with whom you work.

Audits

Audits of your Facility or other environmental investigations of your Facility need to be conducted in a highly confidential manner under the direction of counsel. If you wish to have a Facility audit or investigation to assess your level of compliance with environmental requirements or in connection with a real property transaction, as discussed in Appendix F, contact the Corporate Legal Department in order to arrange for an audit.

What is a Privileged Communication?

Unlike other communications, a privileged communication is a communication between an attorney and usually his or her client that is protected from disclosure in adversarial situations, including litigation. In other words, the content of the communication will be kept confidential.

What Does the Attorney-Client Privilege Cover?

The attorney-client privilege covers confidential oral and written communications between attorney and client, which relate to the legal advice being sought. Thus, any lawyer-client communications that are outside the scope of legal advice are not protected.

Who Holds the Privilege – The Client or the Lawyer?

The privilege belongs to the client, who may refuse to reveal, or prevent another from revealing, the confidential communication. Absent directions from the client to waive the privilege, an attorney generally must assert the privilege on behalf of the client. You should be aware that you can intentionally or unintentionally waive the privilege by failing to observe the formalities of maintaining the privilege. One way to waive the privilege is if the client does not keep their communications confidential.

Why Was the Attorney-Client Privilege Created?

The privilege promotes full and open communication between lawyer and client without apprehension that later disclosure can be compelled without the client's consent. Without full discussion with the client, the lawyer cannot give reliable or effective legal advice.

What Does the Attorney Work Product Doctrine Protect?

The attorney work product doctrine creates a qualified (i.e., not absolute) privilege for the work papers, notes, memoranda, and reports gathered or prepared **by or for** counsel or their agents in anticipation of litigation.

What Does the Attorney Work Product Doctrine Not Protect?

Any material that is considered to be part of the underlying facts or evidence may not be deemed work product. This material includes, for example, the identity or location of evidence, and material objects that can be used as evidence.

Does the Attorney Work Product Doctrine Apply to Documents Prepared Before Litigation Is Threatened?

Yes. If documents are prepared because of a concern about the potential for litigation, even if they were prepared before litigation first was threatened, the privilege would apply. **Thus, the work product doctrine can be a particularly effective tool in maintaining the confidentiality of internal corporate investigatory reports. Documents and materials gathered in the course of an internal corporate investigation, before litigation is actually threatened, may be considered to have been prepared in anticipation of litigation.**

Why Was the Attorney Work Product Doctrine Created?

Courts have recognized that an attorney's or consultant's preparation in anticipation of litigation or for trial should be protected to encourage pretrial investigation and analysis of facts without fear that the information obtained or theories developed could be used to help an adversary's position.

Who Decides if the Privileges Apply in a Particular Case?

As a question of law, the court ultimately determines whether the privileges apply.

May the Attorney-Client and Attorney Work Product Privileges Be Waived?

Yes. The privileges may be waived through authorized or unintentional disclosure to certain third parties either orally or through circulation of written materials. Unauthorized disclosure, such as when documents are stolen or misappropriated, does not waive the privileges.

In the case of the attorney-client privilege, the essential element of confidentiality may be lost if the communication occurs in the presence of third parties who have no legitimate reason for being there. Such third parties would not include your secretary or clerk, or a consultant retained to assist the lawyer in advising his client but **would include parties copied on an otherwise privileged communication with counsel.**

May Communications with a Consultant Usually Be Protected from Disclosure?

Yes, generally not by the attorney-client privilege; instead, such communications may be protected by the attorney work product doctrine.

The federal work product doctrine protects materials compiled, prepared or analyzed both by lawyers and non-lawyers, including consultants. It is not required that the documents be prepared under the direction of an attorney in order to be privileged; however, if materials are prepared by a consultant who is not working under an attorney's supervision, there is a risk that the documents will be found to have been prepared in the ordinary course of business and not in anticipation of litigation.

Does the Attorney Work Product Doctrine Apply If the Consultant Becomes a Witness?

No. Any consultant who is slated to testify at trial may be deposed and thus asked about any opinions offered and the bases for those opinions. On the other hand, any facts known or opinions held by a consultant who has been retained by a party in anticipation of litigation, but who will not be called to testify at trial, constitute protected work product. Therefore, if it is anticipated that a consultant may be needed to testify as an expert witness, it may be desirable to hire two consultants: one to use generally and one for the limited purpose of expert testimony.

What Are the Rules for Maintaining the Attorney-Client Privilege?

Communicate information only to counsel. If communicated orally, other supervisory personnel may be present. If communicated in writing (including via e-mail), **NO OTHER PARTY MAY BE COPIED.**

If communicated in writing (including via e-mail), the following must appear on page one:

**CONFIDENTIAL AND PRIVILEGED ATTORNEY-CLIENT
COMMUNICATION; or**

CONFIDENTIAL; LEGALLY PRIVILEGED

The body of the writing should begin with substantially these words:

"The following information is being provided to you in order to enable you to render legal advice in connection with this matter."

Appendix F

Real Property

1. Introduction

Buying or selling interests in real property can trigger a host of environmental concerns. When acquiring an interest in real estate, it is important that appropriate "due diligence" into the use or condition of the property be undertaken to avoid inheriting environmental problems caused by the previous owners or occupants. Disposing of real estate can likewise trigger environmental concerns. Many states require that advance notice be given to environmental authorities before a Facility can be closed, leased or sold. This Appendix sets forth guidelines for handling environmental issues in mergers, acquisitions, dispositions and other transactions involving real estate.

2. Property Acquisitions

Contact the Corporate Legal Department if you are planning on acquiring any interest in real estate, including any of the following transactions:

- a. Buy real estate;
- b. Buy all or substantially all of the assets of another Facility;
- c. Enter into a new lease;
- d. Renew a lease; or
- e. Exercise an option to lease or purchase.

The **Corporate Environmental Management Team** will advise you of the actions that should be taken before entering into any of the foregoing transactions. This may include undertaking an environmental investigation of the property by a trained consultant.

With respect to any capital project request relating to:

- a. Purchase of real property;
- b. Commencement or renewal of a lease; or
- c. Exercise of an option to lease or purchase.

3. Property Dispositions

Contact the **Corporate Environmental Management Team** if you are planning on disposing of any interest in real estate, including any of the following transactions:

- a. Sell real estate;
- b. Sell all or substantially all of the assets at your Facility;
- c. Lease or sublease property to a tenant;
- d. Terminate a lease; or
- e. Abandon or cease an operation, which will result in closing all or a portion of your Facility.

The **Corporate Environmental Management Team** will advise you of the actions that should be taken before entering into any of the foregoing transactions.

During the negotiation period, the prospective tenant or buyer may undertake its own inquiry into the use and condition of the property. All inquiries from a prospective tenant or buyer should be referred to the **Corporate Environmental Management Team** and Corporate Legal Department and the following guidelines should be observed:

- a. Only environmental permits and Material Safety Data Sheets will be made available to the buyer or tenant by facilities' personnel. All other environmental documents related to the Facility being sold will be made available to the prospective buyer or tenant through the Corporate Legal Department;
- b. Contact the **Corporate Environmental Management Team** immediately if you have information regarding any of the following: (1) major spills that occurred at the Facility; (2) notices of violation or notices to comply issued to the Facility; (3) notices of potential liability from EPA or other government agencies; or (4) complaints from neighbors or others with respect to the Facility; and
- c. Refer all questions on the environmental condition of the Facility to the Corporate Legal Department.

Prospective buyers and representatives of prospective buyers must not tour or inspect the Facility unless accompanied by a member of the **Corporate Environmental Management Team** or its designee. Invasive testing (e.g., soil or groundwater sampling) should not be permitted without approval of and coordination with the Corporate Legal Department.

Appendix G

Environmental Reserves and Report

This is the quarterly report that is required of all Operating Segments. Final reports are due no later than ten (10) days after the end of each calendar quarter and should be submitted to the TDY Corporate Legal Department as an attorney-client privileged document. The report should be responsive to the questions set forth in the following illustrative memorandum attached hereto. The TDY Corporate Legal Department will host a conference call or meeting with representatives of each Operating Segment to discuss its responses. TDY's Chief Financial Officer and TDY's Controller or their respective designees shall participate in such call or meeting.

Example of Quarterly Environmental Reserves Memorandum

[Date]

TO: [Controllers and Facility Environmental Managers]
cc: [TDY CFO, TDY Controller, General Counsel, Facility Managers]
FROM: [TDY Counsel Responsible for Environmental Matters]
RE: [First, Second, Third or Fourth, as Applicable] Quarter 20[XX]
Environmental Reserves and Report

CONFIDENTIAL; ATTORNEY WORK PRODUCT;
ATTORNEY-CLIENT PRIVILEGED DOCUMENT

In order to determine whether adequate reserves have been set for environmental matters and to assist Teledyne Technologies in complying with certain U.S. Securities Exchange Commission requirements, please respond to the following questionnaire on behalf of each facility for which your company is responsible. Your responses should cover both on-site and off-site matters. As stated below, **your response is requested by _____, _____, 20[XX] to [TDY Counsel responsible for environmental matters]. In early _____, we will arrange conference calls with you to discuss your responses.**

- A. During the [First, Second, Third or Fourth, as applicable] Quarter of 20[XX], has your company been involved in any administrative or legal actions or proceedings involving local, state or federal environmental regulations? This includes receiving or responding to:
1. Notices to comply;
 2. Administrative citations, orders or actions;
 3. Notices of violation;
 4. Written or oral requests for information from either local, state or federal authorities with environmental responsibility concerning any past or present activity at or related to your company; and
 5. Any complaint, claim or demand.

If you have answered “Yes” to A, please set forth the nature of the action, proceeding or information request that commenced in the [First, Second, Third or Fourth, as applicable] Quarter of 20[XX] and a status update for matters

previously reported.

- B. Do any of the actions or proceedings identified in A above involve capital or operational expenditures (present or potential) or damage claims in excess of \$100,000? If so, please identify.
- C. Please identify whether the actions or proceedings specified in A above involve (i) a governmental entity, (ii) a private party or (iii) another organization.
- D. If a governmental entity is involved, have any monetary sanctions been demanded or is there a potential for such sanctions? If so, please provide the likely amount of the demanded or potential sanctions, damages, or expenditures.
- E. With respect to any matter related to the environment, has your company received or otherwise been involved in any of the following since [insert prior year end] (your response should include both matters that commenced in the [First, Second, Third or Fourth, as applicable] Quarter of 20[XX] and a status update for matters previously reported to Allegheny Teledyne Incorporated and which remain active or of which there has been no final resolution):

1. ADMINISTRATIVE ORDERS OR REGULATORY REQUIREMENTS:

Any document which directs your company to take action or any circumstance that triggers regulatory requirements to undertake investigations or remedial action which, in either case, is likely to result in expenditures in excess of \$50,000 per year for two years or more than \$100,000 for any single year?

2. AGREEMENTS:

Any Agreement, contract or settlement agreement with any local, state or federal governmental agency, PRP group, or other person or entity which commits your company to expend funds relating to an environmental matter regardless of the amount involved.

3. FINES, PENALTIES, JUDGMENTS:

The demand, assessment or payment of any fines, penalties, or judgments associated with administrative or judicial actions.

4. ANY LAWSUIT.

DO NOT INCLUDE THE FOLLOWING: Normal operating expenses and capital improvements (e.g., installation of stack scrubbers, underground tank removal, waste water treatment plant upgrades); Form R

compliance; normal permit applications, monitoring, reporting for sewer, air, water or hazardous waste permits; hazardous waste and facility fees under RCRA; or routine inquiries, surveys, and questionnaires.

If you have answered “Yes” to 1, 2, 3, or 4 above, please provide a description of the matter, the facility involved and a status update for ongoing matters.

- F. Have you set reserves on your books or made any adjustment to reserves previously set on your books with respect to any matter relating to the environment? If so, please prepare a schedule in the format of Schedule I attached, in accordance with the following instructions. Use additional sheets for explanations, if necessary. **To assist you in your response to this item, attached as Annex A is a summary of certain accounting guidelines for setting and reevaluating environmental reserves. Please familiarize yourself with these guidelines prior to completing the schedules. You will note that the Annex discusses the types of legal costs that should be included in your company’s reserves. If necessary, the Law Department will assist you in collecting this information and adjusting your reserves as appropriate in the [First, Second, Third or Fourth, as applicable] Quarter of 20[XX].**
- G. Please list the name and address of each facility for which your company is responsible. If your response does not cover any of these facilities, please explain.

INSTRUCTIONS – SCHEDULE I

- (1) MATTER: Where a reserve covers more than one environmental matter, list each matter separately. For matters involving on or off-site investigation and remediation, segregate the matter into projects or segments (e.g., groundwater investigation, soil investigation, groundwater remediation, soil excavation, soil vapor extraction, remedy planning, or selection).
- (2) INCREASE/DECREASE: Amounts in this column have an income statement effect.
- (3) REASON: For each increase/decrease to the reserve, enter the code from the following list:
- (A) Changed Circumstances
 - (i) Resolution of negotiations with agencies
 - (ii) Resolution of technical issues

- (iii) Obtain results of investigations
- (iv) Change in regulatory requirements
- (v) Other (Explain)

- (B) Entering new stage of investigation or remediation
- (C) Correction of an error (Explain)
- (D) Legal Costs
- (E) Other (Explain)

Identify the basis for each increase/decrease to the reserve. For example – revised estimate from consultant; demand received; etc. Identify the person(s) at the Company responsible for estimating the reserve.

If you have any questions or comments about this report, please call me at [insert phone number of applicable TDY Counsel].

ANNEX A

AICPA Statement of Position 96-1, Environmental Remediation Liabilities (the “SOP”) established accounting standards for recognition of environmental costs. This SOP is now embedded under ASC Topic 410, Subtopic 30. Basically, losses should be accrued if they are both probable and reasonably estimable. Summarized below are several key points that you should consider as you set and periodically reevaluate your company’s environmental reserves.

- An accrual is required even where no single amount of loss can be estimated. Where there is a range of estimated loss, and no amount within the range is a better estimate, the low end of the range should be accrued. **If the reserve your company has set for any particular matter represents the low end of a range of probable costs, please note this in the “Comments” section of Schedule I and describe the range.**
- If particular components of the overall liability for a site are not reasonably estimable at the early states of the remediation process, the sum of the components that can be reasonably estimated at that time (e.g., investigation costs) should be treated as the minimum in the range of the overall liability and should be booked.
- The recognition of a remediation liability for a site in most cases should not be delayed beyond the point at which the company has completed a feasibility study or similar report for a site or recommended a proposed course of action to the EPA or other governmental body.
- Accruals should be reevaluated at each stage of the investigation and remediation process including preliminary investigation, remedy planning, remedy implementation. Accruals are to include estimates for on-going operation and maintenance of remediation systems over the life of the project.
- It is inappropriate to net probable recoveries for insurance or indemnification against the loss. Rather, the two are to be separately evaluated and booked if appropriate.
- The costs of legal work related to the remediation effort should be included in the measurement of a remediation liability (e.g., legal advice concerning remediation standards or obligations.) This does not include legal costs related to routine environmental compliance matters, litigation costs related to potential recoveries or legal defense costs related to remediation. **If your company’s reserves do not include appropriate legal costs, please indicate these in the “Comments” section of Schedule I.**
- ASC Topic 410, Subtopic 30 and other accounting literature contain very specific guidelines regarding when it is appropriate to discount environmental liabilities and when inflation-adjusted cost estimates should be used. **The reserves listed on Schedule I should reflect undiscounted, current cost estimates. If you have any questions regarding the appropriate use of**

discounting or inflation adjustments, please consult Teledyne's Chief Financial Officer.

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

TELEDYNE TECHNOLOGIES INCORPORATED
 RESERVES REPORT
 [FIRST, SECOND, THIRD OR FOURTH] QUARTER 20[XX]

SCHEDULE I

CONFIDENTIAL
 ATTORNEY WORK PRODUCT; ATTORNEY-CLIENT PRIVILEGED DOCUMENT

COMPANY NAME _____
 DATE PREPARED _____

Matter (1) Project/ Segment	Reserve Balance [Prior Quarter]	Reserve Balance [Prior Quarter]	Reserve Balance [Prior Quarter]	Reserve Balance [Prior Quarter]	Reserve Balance [Current Quarter End]]	Analysis of [1 ST , 2 ND , 3 RD or 4 th] Quarter 20[XX] Reserve				Estimated Payments Next Twelve Months
						Increase/Decrease Reserve		Decrease Reserve For Payment s DR	Reserv e Balance [Current Quarter End]	
						DR (CR) RES (2)	Reason (3)			
TOTAL										

Appendix H
Form of Compliance Certification

20/XX/ Annual Environmental, Health and Safety Compliance Certification
Teledyne Technologies Incorporated

Name and Location of Facility: _____

Name of General Manager: _____

Name of Environmental Manager: _____

Name of Health and Safety Manager: _____

Section I – Environmental Compliance Certification

We, the general manager and the environmental manager of the above-named facility (the “Facility”), hereby certify to the each of [TDY’s Chief Executive Officer] and [TDY’s Chief Financial Officer], of Teledyne Technologies Incorporated (“Teledyne”), to the best of our knowledge and belief, except as expressly set forth on Attachment A, as follows:

1) For Domestic Operations (to be completed by facilities located within the United States. International operations skip question 1 and go to question 2.)

a) We have reviewed Teledyne’s Environmental Management System (“EMS”) manual and the Facility EMS and are familiar with Teledyne’s environmental policy.

Check box if any exception is being reported.

b) We have responsibility for carrying out the Facility EMS.

Check box if exception to be reported.

c) The Facility is in compliance in all material respects with Teledyne's EMS manual, the Facility EMS and with applicable environmental laws.

Check box if any exception is being reported.

d) The Facility’s internal controls relating to its EMS are reasonable and satisfactory and we consider the Facility’s EMS adequate to ensure that material information relating to noncompliance with environmental laws and regulations is made known to us.

Check box if any exception is being reported.

2) For International Operations (facilities located outside of the United States)

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

- a) We have responsibility for managing the Facility's environmental compliance.
- Check box if exception to be reported.*
- b) The Facility is in compliance in all material respects with applicable environmental laws and regulations.
- Check box if any exception is being reported.*
- c) The Facility's internal controls relating to its environmental programs are reasonable and satisfactory and we consider the Facility's environmental programs adequate to ensure that material information relating to noncompliance with environmental laws and regulations is made known to us.
- Check box if any exception is being reported.*
- 3) There were no Environmental Incidents reported or required to be reported during the fiscal year 20[XX].
- Check box if any Environmental Incident is being reported [This box should be checked if any Environmental Incident occurred during the year and such Environmental Incident should be briefly described on Attachment A.]*
- Check this box if any and all Environmental Incidents have been or are being resolved in accordance with their corrective action plans.*
- Check this box if any Environmental Incident has not been timely corrected and please describe status on Attachment A.*
- 4) There were no inspections or visits (scheduled or surprise) by governmental environmental regulatory agencies of the Facility during the fiscal year 20[XX]. All findings made by the inspector have been or are being resolved.
- Check box if any inspection is being reported [This box should be checked if any inspection occurred during the year and briefly describe such inspection on Attachment A.]*
- Check this box if any and all inspection findings Incidents have been or are being resolved in accordance with their corrective action plans.*
- Check this box if any inspection finding has not been timely corrected and please describe status on Attachment A.*
- 5) During the fiscal year 20[XX]., the Facility was not made a party, or threatened to be made a party, to any administrative or judicial proceeding arising out of any environmental law or regulation.
- Check box if any proceeding is being reported. [This box should be checked if any proceeding existed (including ongoing proceeding from prior year(s)) or was threatened*

during the year and briefly describe such matter on Attachment A.]

- 6) During the fiscal year 20[XX]., no monetary sanction, penalty, assessment or demand was paid to, or threatened by, any governmental authority relating to environmental compliance or non-compliance of the Facility.

Check box if any exception is being reported. [This box should be checked if any amount was paid or demanded during the year and briefly describe such status on Attachment A.]

- 7) No disciplinary actions on any of the Facility's employees for environmental-related violations or matters were required during the fiscal year ended 20[XX].

Check box if any exception is being reported. [This box should be checked if any employee environmental compliance-related disciplinary action occurred during the year and briefly describe such action on Attachment A.]

- 8) The Facility's employees have received a level of training relating to environmental matters and compliance appropriate to their job responsibilities.

Check box if any exception is being reported. [This box should be checked if any required training was not done in fiscal 20[XX]. and briefly describe such outstanding training and training schedule for 20[XX]. on Attachment A.]

- 9) We do not know of any facts or circumstances relating to Teledyne and its subsidiaries that could constitute fraud (i.e. bribery and corruption, financial statement fraud or asset misappropriation) or otherwise give rise to a breach of the Teledyne's Global Code of Ethical Conduct.

Check box if any exception is being reported and separately and promptly contact [Teledyne's General Counsel or Associate General Counsel.]

- 10) We have developed and maintain a system, e.g. an EHS Program Calendar, that identifies required environmental reports, plans, notices, inspections, monitoring, training, etc., and applicable regulatory requirements, e.g. frequency of submission/inspection, due date, responsible person, record location, etc.

Check box if any exception is being reported.

Section II – Health and Safety Compliance Certification:

We, the general manager and the health and safety manager of the above-named facility (the “Facility”), hereby certify to the each of *[TDY’s Chief Executive Officer]* and *[TDY’s Chief Financial Officer]*, of Teledyne Technologies Incorporated (“Teledyne”), to the best of our knowledge and belief, except as expressly set forth on Attachment A, as follows:

1. We have reviewed Teledyne’s Health and Safety Management System (“HSMS”) manual and are familiar with Teledyne’s health and safety policy.
 - Check box if any exception is being reported.*

2. We have responsibility for carrying out the Facility HSMS.
 - Check box if any exception is being reported.*

3. The Facility is in compliance in all material respects with Teledyne’s HSMS manual and with applicable health and safety laws.
 - Check box if any exception is being reported.*

4. The Facility’s internal controls relating to its HSMS are reasonable and satisfactory and we consider the Facility’s HSMS adequate to ensure that material information relating to noncompliance with health and safety laws and regulations is made known to us.
 - Check box if any exception is being reported.*

5. There were no work-related injuries, illnesses, or incidents reported or required to be reported during the fiscal year 20[XX].
 - Check box if any work-related injuries, illnesses, or incidents were reported during the fiscal year 20[XX] and check appropriate box below.*
 - All work-related injuries, illnesses, and incidents have been resolved in accordance with the Facility’s Incident, Response, Investigation and Reporting procedure.*
 - Check this box if any work-related injury, illness or incident has not been timely corrected and please describe status on Attachment A.*

6. There were no inspections or visits (scheduled or surprise) by governmental health and safety regulatory agencies of the Facility during the fiscal year 20[XX].
 - Check box if any inspection is being reported [This box should be checked if any inspection occurred during the year and briefly describe such inspection on Attachment A.]*

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

Check this box if any and all inspection findings Incidents have been or are being resolved in accordance with their corrective action plans.

Check this box if any inspection finding has not been timely corrected and please describe status on Attachment A.

7. During the fiscal year 20[XX], the Facility was not made a party, or threatened to be made a party, to any administrative or judicial proceeding arising out of any health and safety law or regulation.

Check box if any exception is being reported.

8. During the fiscal year 20[XX], no monetary sanction, penalty, assessment or demand was paid to, or threatened by, any governmental authority relating to health and safety compliance or non-compliance of the Facility.

Check box if any exception is being reported.

9. No disciplinary actions on any of the Facility's employees for health and safety-related violations or matters were required during the fiscal year ended 20[XX].

Check box if any exception is being reported.

10. The Facility's employees have received a level of training relating to health and safety matters and compliance appropriate to their job responsibilities.

Check box if any exception is being reported. [This box should be checked if any required training was not done in fiscal 20[XX] and briefly describe such outstanding training and training schedule for 20[XX] on Attachment A.]

11. We do not know of any facts or circumstances relating to Teledyne and its subsidiaries that could constitute fraud (i.e. bribery and corruption, financial statement fraud or asset misappropriation) or otherwise give rise to a breach of the Teledyne's Global Code of Ethical Conduct.

Check box if any exception is being reported and separately and promptly contact [Teledyne's General Counsel or Associate General Counsel].

12. While not deemphasizing other important H&S compliance programs, all facility machinery and equipment is appropriately guarded and the facility has established a program and utilizes procedures for affixing appropriate lockout devices or tagout devices to energy isolating devices, and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy in order to prevent injury to employees.

Check box if any exception is being reported.

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

13. We have developed and maintain a system, e.g. an EHS Program Calendar, that identifies required health and safety reports, plans, notices, inspections, monitoring, training, etc., and applicable regulatory requirements, e.g. frequency of submission/inspection, due date, responsible person, record location, etc.

Check box if any exception is being reported.

14. We have identified all employees who operate company vehicles, rental vehicles or personal vehicles in connection with company business and verify, on an annual basis, that these employees have a valid driver license and maintain a good driving record.

Check box if any exception is being reported.

20/XX] Annual Environment, Health and Safety Compliance Certification

We understand that if we become aware of any misstatement or inaccuracy in this certification after the date hereof, we will contact [*Teledyne General Counsel or Associate General Counsel.*]

WITNESS the due execution as of January __, 20/XX].

 <hr/>
(<i>signed</i>) General Manager
Signing only with respect to the environmental requirements and matters addressed by this Certificate. <hr/>
(<i>signed</i>) Environmental Manager
Signing only with respect to the health and safety requirements and matters addressed by this Certificate. <hr/>
(<i>signed</i>) Health and Safety Manager

Attachment A to Annual Environmental, Health and Safety Compliance Certification

Facility Name: _____

Check applicable box:

- No exceptions to report.
- The following exceptions to the certification are reported: [cross reference to specific section and item and provide reasonable summary]

Section I Environmental Certification Exceptions:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

Section II – Health and Safety Certification Exceptions:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.

Number of
Pages Attached _____

Appendix I
Brief Summary of Major U.S. Federal Environmental Statutes and
U.S. Federal Regulatory Citations for Environmental Regulations

MAJOR FEDERAL ENVIRONMENTAL STATUTES

CERCLA
SARA
Clean Air Act
Clean Water Act
Emergency Planning & Community Right to Know Act
Oil Pollution Act
Pollution Prevention Act
Resource Conservation and Recovery Act (Solid Waste Disposal Act)
Toxic Substance Control Act
Safe Drinking Water Act
Endangered Species Act
Noise Control Act of 1972
Hazardous Materials Transportation Act
Title 40 Code of Federal Regulations – Protection of the Environment
Chapter 1 Environmental Protection Agency

1. Comprehensive Environmental Response Compensation and Liability Act (CERCLA)

Statute: 42 U.S.C. Sec 9601 et seq (1980), as amended.

Regulations: Various (see 40 CFR §§300-311)

Administering Agency: Environmental Protection Agency

CERCLA, commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad Federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. In general, CERCLA

- established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- provided for liability of persons responsible for releases of hazardous waste at these sites; and
- established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response.
- Long-term remedial response actions, that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are

serious, but not immediately life threatening. These actions can be conducted only at sites listed on EPA's National Priorities List (NPL).

2. The Superfund Amendments and Reauthorization Act (SARA)

SARA amended CERCLA on October 17, 1986. SARA reflected EPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. SARA:

- stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites;
- required Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations;
- provided new enforcement authorities and settlement tools;
- increased State involvement in every phase of the Superfund program;
- increased the focus on human health problems posed by hazardous waste sites;
- encouraged greater citizen participation in making decisions on how sites should be cleaned up; and

SARA also required EPA to revise the Hazard Ranking System (HRS) to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the National Priorities List (NPL).

3. Clean Air Act

Statute: 42 U.S.C. s/s 7401 et seq. (1970)

Regulations: 40 CFR §§50-97

Administering Agency: Environmental Protection Agency

The Clean Air Act is the comprehensive Federal law that regulates air emissions from area, stationary, and mobile sources. This law authorizes the U.S. Environmental Protection Agency to establish National Ambient Air Quality Standards (NAAQS) to protect public health and the environment.

The goal of the Act was to set and achieve NAAQS in every state by 1975. The setting of maximum pollutant standards was coupled with directing the states to develop state implementation plans (SIP's) applicable to appropriate industrial sources in the state.

The Act was amended in 1977 primarily to set new goals (dates) for achieving attainment of NAAQS since many areas of the country had failed to meet the deadlines. The 1990 amendments to the Clean Air Act in large part were intended to meet unaddressed or insufficiently addressed problems such as acid rain, ground-level ozone, stratospheric ozone depletion, and air toxics.

4. Clean Water Act (Federal Water Pollution Control Act) (1972)

Statute: 33 U.S.C. Sec 1251 et seq

Regulations: 40 CFR §§104-159, 400-471

Administering Agency: Environmental Protection Agency

Growing public awareness and concern for controlling water pollution led to enactment of the Federal Water Pollution Control Act Amendments of 1972. As amended in 1977, this law became commonly known as the Clean Water Act. The Act established the basic structure for regulating discharges of pollutants into the waters of the United States. It gave EPA the authority to implement pollution control programs such as setting wastewater standards for industry. The Clean Water Act also continued requirements to set water quality standards for all contaminants in surface waters. The Act made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained under its provisions. It also funded the construction of sewage treatment plants under the construction grants program and recognized the need for planning to address the critical problems posed by nonpoint source pollution.

Subsequent enactments modified some of the earlier Clean Water Act provisions. Revisions in 1981 streamlined the municipal construction grants process, improving the capabilities of treatment plants built under the program. Changes in 1987 phased out the construction grants program, replacing it with the State Water Pollution Control Revolving Fund, more commonly known as the Clean Water State Revolving Fund. This new funding strategy addressed water quality needs by building on EPA-State partnerships.

The law is codified in 33 U.S.C. Chapter 26, which is available online through a number of sources.

5. Emergency Planning & Community Right to Know Act (EPCRA)

Statute: 42 U.S.C. 11001 et seq. (1986)

Regulations: 40 CFR §§350-372

Administering Agency: Environmental Protection Agency

Also known as Title III of SARA, EPCRA was enacted by Congress as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards.

To implement EPCRA, Congress required each state to appoint a State Emergency Response Commission (SERC). The SERC's were required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee (LEPC) for each district.

Broad representation by fire fighters, health officials, government and media representatives, community groups, industrial facilities, and emergency managers ensures that all necessary elements of the planning process are represented.

6. Oil Pollution Act

Statute: 33 U.S.C. 2702 et seq

Regulations: 33 CFR §§135

Administering Agency: United States Coast Guard

The Oil Pollution Act (OPA) of 1990 streamlined and strengthened EPA's ability to prevent and respond to catastrophic oil spills. A trust fund financed by a tax on oil is available to clean up spills when the responsible party is incapable or unwilling to do so. The OPA requires oil storage facilities and vessels to submit to the Federal government plans detailing how they will respond to large discharges. EPA has published regulations for aboveground storage facilities; the Coast Guard does so for oil tankers. The OPA also requires the development of Area Contingency Plans to prepare and plan for oil spill response on a regional scale.

7. Pollution Prevention Act

Statute: 42 U.S.C. 13101 and 13102, sections et seq. (1990)

Regulations: various

Administering Agency: Environmental Protection Agency

The Pollution Prevention Act focused industry, government, and public attention on reducing the amount of pollution through cost-effective changes in production, operation, and raw materials use. Opportunities for source reduction are often not realized because of existing regulations, and the industrial resources required for compliance, focus on treatment and disposal. Source reduction is fundamentally different and more desirable than waste management or pollution control.

Pollution prevention also includes other practices that increase efficiency in the use of energy, water, or other natural resources, and protect our resource base through conservation. Practices include recycling, source reduction, and sustainable agriculture.

8. Resource Conservation and Recovery Act (Solid Waste Disposal Act) (RCRA)

Statute: 42 U.S.C. Sec 6901 et seq. (1976)

Regulations: 40 CFR §§ 239-282

Administering Agency: Environmental Protection Agency

RCRA (pronounced "rick-rah") gave EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also set forth a framework for the management of non-hazardous wastes.

The 1986 amendments to RCRA enabled EPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances. RCRA focuses only on active and future facilities and does not address abandoned or historical sites (see CERCLA).

HSWA (pronounced "hiss-wa")—The Federal Hazardous and Solid Waste Amendments are the 1984 amendments to RCRA that required phasing out land disposal of hazardous waste. Some of the other mandates of this strict law include increased enforcement authority for EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.

9. Toxic Substances Control Act

Statute: 15 U.S.C. Sec 2601 et seq. (1976)

Regulations: 40 CFR §§700-790

Administering Agency: Environmental Protection Agency

The Toxic Substances Control Act (TSCA) of 1976 was enacted by Congress to give EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. EPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. EPA can ban the manufacture and import of those chemicals that pose an unreasonable risk.

Also, EPA has mechanisms in place to track the thousands of new chemicals that industry develops each year with either unknown or dangerous characteristics. EPA then can control these chemicals as necessary to protect human health and the environment. TSCA supplements other Federal statutes, including the Clean Air Act and the Toxic Release Inventory under EPCRA

10. Safe Drinking Water Act

Statute: 42 U.S.C. 300f et seq. (1974)

Regulations: 40 CFR §§141-142

Administering Agency: Environmental Protection Agency

The Safe Drinking Water Act was established to protect the quality of drinking water in the U.S. This law focuses on all waters actually or potentially designed for drinking use, whether from above ground or underground sources.

The Act authorized EPA to establish safe standards of purity and required all owners or operators of public water systems to comply with primary (health-related) standards. State governments, which assume this power from EPA, also encourage attainment of secondary standards (nuisance-related).

11. Endangered Species Act

Statute: 7 U.S.C. 136; 16 U.S.C. 460 et seq. (1973)

Regulations: Various

Administering Agency: Department of Interior / Environmental Protection Agency

The Endangered Species Act provides a program for the conservation of threatened and endangered plants and animals and the habitats in which they are found. The U.S. Fish and Wildlife Service of the Department of the Interior maintains the list of 632 endangered species (326 are plants) and 190 threatened species (78 are plants).

Species include birds, insects, fish, reptiles, mammals, crustaceans, flowers, grasses, and trees. Anyone can petition FWS to include a species on this list. The law prohibits any action, administrative or real, that results in a "taking" of a listed species, or adversely affects habitat. Likewise, import, export, interstate, and foreign commerce of listed species are all prohibited.

EPA's decision to register a pesticide is based in part on the risk of adverse effects on endangered species as well as environmental fate (how a pesticide will affect habitat). Under FIFRA, EPA can issue emergency suspensions of certain pesticides to cancel or restrict their use if an endangered species will be adversely affected. Under a new program, EPA, FWS, and USDA are distributing hundreds of county bulletins that include habitat maps, pesticide use eliminations, and other actions required to protect listed species.

12. Noise Control Act of 1972

Statute: 42 U.S.C. 4901 et seq

Regulations: 40 CFR §§204-205

Administering Agency: Environmental Protection Agency

SEC. 2 [42 U.S.C. 4901] Findings and Policy.

(a) The Congress finds--

(1) that inadequately controlled noise presents a growing danger to the health and welfare of the Nation's population, particularly in urban areas;

(2) that the major sources of noise include transportation vehicles and equipment, machinery, appliances, and other products in commerce; and

(3) that, while primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce control of which require national uniformity of treatment.

(b) The Congress declares that it is the policy of the United States to promote an environment for all Americans free from noise that jeopardizes their health or welfare. To that end, it is the purpose of this Act to establish a means for effective coordination of Federal research and activities in noise control, to authorize the establishment of Federal noise emission standards for products distributed in commerce, and to provide information to the public respecting the noise emission and noise reduction characteristics of such products.

13. Hazardous Materials Transportation Act (HMTA) as amended by the Hazardous Materials Transportation Uniform Safety Act of 1990, PL 101-615

Statute: 49 U.S.C. § 1801-1819

Regulations: 49 CFR § 106-180

Administering Agency: U.S. Department of Transportation

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

General Description: The Hazardous Materials Transportation Act (HMTA) empowers the U.S. Department of Transportation to regulate the transportation of hazardous materials by rail, aircraft, vessel, and public highway. HMTA was amended in 1976 and 1990. These amendments substantially revised existing provisions and added new requirements. Hazardous materials are defined as those chemicals that the Department of Transportation has determined pose unreasonable risks to health, safety, and property during transport activities (see 49 CFR § 172.101). The statute and its regulations address issues such as shipping papers to identify and track hazardous materials, packaging and container design, marking, labeling, and performance standards, and employee and public training programs. The regulations also contain specific requirements relating to the type of shipment being used (i.e., rail, aircraft, vessel, and public highway).

Major Statutory and Regulatory Provisions:

Directs the Secretary of Transportation to issue regulations addressing the designation, description, and classification of hazardous materials; packaging, labeling, and marking requirements applicable to hazardous materials; and the design, manufacturing, testing, and maintenance of packages or containers used in hazardous material transportation (49 U.S.C. § 1804; 49 CFR 171, 173-177)

Directs each state to designate and enforce specific highway routes that may be used for hazardous materials transportation and to establish limitations and conditions on the use of those approved routes (49 U.S.C. § 1804; 49 CFR 171, 173-177)

Requires the Secretary of Transportation to issue regulations addressing safety training for all employees involved with the handling, storing, management, and transportation of hazardous materials (49 U.S.C. 1805; 49 CFR 172, Subpart H)

Requires the Secretary of Transportation to promulgate rules addressing emergency preparedness for responding to accidents or incidents relating to hazardous materials transportation (49 U.S.C. § 1805; 49 CFR 172, Subpart G)

Requires all persons who offer any regulated hazardous material for transport to describe the material appropriately in the accompanying shipping papers (49 U.S.C. § 1804; 49 CFR 172, Subpart C)

Requires that persons who offer regulated hazardous materials for transportation mark each package or container to identify the hazardous materials according to approved methods as specified in the regulations (49 U.S.C. § 1804; 49 CFR 172, Subpart D)

Requires that persons offering hazardous materials for transportation properly label or place appropriate placards on the package or container used in the transport activity (49 U.S.C. § 1804; 49 CFR 172, Subparts E, F)

Establishes a grant program for states to establish hazardous material training programs for the public sector (49 U.S.C. § 1815; 49 CFR 110)

Establishes a comprehensive set of general requirements for shipments and packaging of hazardous materials, addressing the proper preparation (e.g., correct package selection and quantity limits) for transportation, classification of hazardous materials, and the specific types of containers and packages that can be used to transport materials in each classification (49 U.S.C. § 1804-1805; 49 CFR 173)

ENVIRONMENTAL MANAGEMENT SYSTEM MANUAL

Provides additional handling, operating, loading, and management requirements for the shipment of hazardous materials by each of the following transportation modes: rail, aircraft, vessel, and public highway (49 U.S.C. § 1804-1805; 49 CFR 174-177)

Sets out technical design, manufacturing, and performance standards for the various packages and containers used in hazardous material transportation (49 U.S.C. § 1804-1805; 49 CFR 178)

Provides technical design, manufacturing, and performance standards for rail cars used in hazardous materials transportation (40 U.S.C. § 1804-1805; 49 CFR 179)

Applies to or Affects: Handling, storage, management, and transportation of hazardous materials and labeling, packing, and shipping of hazardous materials.

Title 40--Protection of Environment

CHAPTER I--ENVIRONMENTAL PROTECTION AGENCY

See link to electronic code of federal regulations, Title 40 Code of Federal Regulations – Protection of the Environmental, Chapter 1 – Environmental Protection Agency:

<https://www.ecfr.gov/cgi-bin/text-idx?SID=819c51846650c39595d77881bcf7ea9e&mc=true&tpl=/ecfrbrowse/Title40/40chapterI.tpl>