

ENVIRONMENTAL COMPLIANCE OBLIGATIONS

1.0 Scope

This instruction applies to the entire operations of Uchiyama Manufacturing America LLC (UMA).

2.0 Responsibility and Authority

Projects, Environment and Safety Manager (PESM) has overall responsibility for monitoring and keeping abreast of all Federal, State and Local regulations that will have an impact on the operations of plant and offices of UMA.

3.0 Legal Regulations Monitoring

- 3.1 Methods of monitoring regulations will be done by subscribing to web sites of the various regulating agencies to include, but not limited to: OSHA, NCDEQ, NCDOL, and USEPA.
- 3.2 Web sites will be reviewed on a minimum of a quarterly basis or whenever there is an indication that the web site has been updated.
- 3.3 Other web sites, publications, workshops and seminars deemed to assist in the compliance of regulations will be maintained by personnel as deemed necessary to maintain regulatory
- 3.4 Written manuals of regulations will be maintained by the PESM as it pertains to the environmental aspects of the Company.
- 3.5 Any and all permits shall be filed and maintained by the PESM.
- 3.6 The PESM will assist any agency that performs site visits and or inspections.
- 3.7 UMA will respond in a reasonable amount of time to any new regulations that affects the operations of UMA.

4.0 Fire Marshall Inspections

- 4.1 Goldsboro City Fire Marshall/ Captain will perform an annual fire inspection.

5.0 Hazardous Waste Pick-Up

- 5.1 **Legal Requirement** : UMA must receive a signed 'Generator Copy' at time of pick-up the TSDf shall sign the original through the EPA Central Data Exchange (CDX, EPA, GOV) within 30 days from the original pickup.
 - 5.1.1 It is the responsibility of the PESM to verify these records are received in CDX and take corrective action if necessary.
 - 5.1.2 The PESM will record the pick up on the Environmental Log and review CDX for returned final signed manifests.

6.0 Air Permit

- 6.1 Records of maintenance on the Smog Hog is maintained by the Gasket Mfg. Department and may be reviewed by NCDEQ.
- 6.2 Applies to the following aspects: Post Cure Ovens, Odor from Oven Room, KM722A Silicone (Gsk Mfg.), Smoke, and Waste from the Smog Hog.

7.0 RCRA, Small Quantity Generator of Hazardous Waste

- 7.1 Hazardous Waste Generation is limited to maximum of 1000kg of non-acute hazardous waste per month.
- 7.2 PESM will monitor and chart hazardous waste generation monthly.
- 7.3 Hazardous Waste Daily Inspection (#CL16-001), Hazardous Waste Oil & Chemical Storage Inspection Checklist (#CL03-005) will be maintained by the Metal Treatment department for one calendar year and then given to PESM for an additional year.
- 7.4 This information may be reviewed by NCDEQ during unannounced inspections.
- 7.5 Aspects considered hazardous waste (ex: MEK, Toluene, Uchiyama Thinner, Phenolite, LJ-203A, etc.)

8.0 Boiler

- 8.1 Inspected annually by NCDOL (Boiler Division)
- 8.2 Applies to all aspects on the Boiler List.

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9.0 Pressure Vessel

9.1 Inspected every 2 years by NCDOL.

9.2 Applies to pressure vessels throughout the plant (air tanks) and in the water treatment area.

10.0 Fire Suppression System, Fire Alarms & Extinguisher Inspection

10.1 A qualified third party will inspect the fire suppression system annually.

10.2 A qualified third party will inspect the fire alarm system annually per NFPA 72.

10.3 The Maintenance department will inspect fire extinguishers monthly.

10.4 A qualified third party will inspect the fire extinguishers annually.

11.0 AST Inspection

11.1 Monthly AST Inspection performed by maintenance.

11.2 Annual AST Inspection performed by Maintenance.

12.0 Compliance Audits:

12.1 Air Permit:

12.1.1 Smog Hog Emissions: Perform Visible Emissions Observations by trained and certified smoke readers on a monthly basis and documented on QF16-001. In the event trained observers cannot perform VEOs during the month, a reason as to the condition why must be documented i.e. weather or expired training due to class availability.

12.2 Storm Water Discharge Permit:

12.2.1 Maintain certificate coverage through annual fee payment to NC Department of Environmental Quality, Division of Energy, Mineral and Land Resources for required general permitting for stormwater discharge.

12.2.2 Perform all required monitoring outlined in the general permit.

12.2.2.1 Document quarterly outfall inspections monitoring on Stormwater Discharge Outfall (SDO) Qualitative Monitoring Report SWU-242 (#4391)

12.2.2.2 Use the Stormwater Discharge Outfall (SDO) Qualitative Monitoring Report Supplement SWU-242A (#4392) for guidance in rating Stormwater Discharge.

12.2.2.3 Perform quarterly Quantitative Stormwater sampling for each outfall and submit to a third party laboratory for analysis.

- Submit the results using the NC electronic Discharge Monitoring Reports (eDMR) online.

12.2.3 Incorporate a Spill Prevention Control and Countermeasure Plan (SPCC) in conjunction to the Stormwater Pollution Prevention Plan.

12.3 Department of Transportation Registration:

12.3.1 Maintain DOT registration every three years in order to offer for transport 1001 lbs. of waste.

12.4 Federal:

12.4.1 Training Records: HAZCOM training records retained for same period as personnel records (7 years).

12.4.2 Wood Pallets: Wooden pallets being used for out of country destinations must be heat marked.

12.5 State

12.5.1 OSHA: Maintain OSHA 300 Log annual report posted and filed for 5 years.

12.5.2 Small Quantity Waste Generator: Annual report is prepared and submitted through Erplan and fee paid for filing.

12.5.3 NCDEQ/ESI: Submit Annual report to maintain current Environmental Stewardship status, as appropriate.

12.6 County / City

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- 12.6.1 Cardboard: Cardboard is restricted from the landfill.
- 12.6.2 Attempt to not exceed limitations outlined in Goldsboro Sewer Regulations §51.012 prior to release of water from waste water treatment facility, back to the city. UMA may have Certified Waste Disposal Company pick up non compliant water discharges. However, UMA has an Exemption letter for discharge as the limits of zinc and nickle do not exceed the quantitative limits outlined in regulations.
- 12.7 **IMDS**
 - 12.7.1 IMDS: International Material Data System as required by the latest edition of the PPAP in AIAG
 - 12.7.1.1 UMA IMDS system is managed by Japan.
 - 12.7.1.2 Customer requests IMDS number, UMA forwards request to Japan, Japan sends ID number to UMA, UMA forwards ID number to customer.
- 12.8 **Conflict Minerals:**
 - 12.8.1 Required by Securities and Exchange Commission (SEC) mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act.
 - 12.8.1.1 Conflict minerals reporting, smelters investigations is ultimately managed by Japan.
 - 12.8.1.2 Customer requests Conflict Minerals Reporting; UMD will forward requests to Japan. Japan investigates Smelters, as necessary, and returns CMRT to UMD. UMD will verify checker tab on CMRT and inputs information into Ipoint and responds to original customer requests.
- 12.9 If a problem occurs and UMA is out of compliance, NCDEQ is notified and corrective action is taken.
- 12.1 An audit of the above compliances is performed throughout the year.
- 12.1 An evaluation of compliance on above compliances will be performed by a third party every three